

October 12, 2023 4:07 PM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY:JMW SCANNED BY: KB 10/13

BEFORE THE DE JURE

DISTRICT COURT OF THE UNITED STATES OF AMERICA FEDERAL COURT
[Pursuant to Art. III, Section 1-2, Constitution for the United States of America]
(1) In The Western District Of Michigan [Art. 1, § 2, Clause 3, Art 4, § 4]

In re the United States of America in the Family of
Nations; The United States Government in The
Family of Nations; The State of Michigan
Republican Form of Government.

CASE RECORD NUMBER

COUNTER CLAIM FOR COLOR OF LAW
CLAIM FOR CONSTITUTIONAL DEPRIVATION and CIVIL VIOLATIONS
DENIAL OF CONSTITUTIONAL RIGHTS, INTEREST AND IMMUNITIES
GUARANTEED BY CONSTITUTION FOR THE UNITED STATES OF AMERICA
REPUBLICAN FORM OF GOVERNMENT

Solon-keith: Tatum, Suitor Sui juris
5458 Pinebrook Avenue Southeast
Grand Rapids Michigan 49548
616.238.9204

1:23-cv-1088
Jane M. Beckering
U.S. District Judge

Vs.

Defendant 1

IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN

111 S Capitol Ave
Lansing, MI, 48933-1555
(517) 373-7910

DEENDANT 2

TRACI L. SCHENKEL

FRIEND OF THE COURT - KENT COUNTY

KENT COUNTY FRIEND OF THE COURT OFFICE OF THE FRIEND OF THE COURT,
THE OFFICE OF CHILD SUPPORT, THE PROSECUTING ATTORNEY'S OFFICE
TITLE IV-D AGENCY

82 Ionia Ave NW # 200 GRAND RAPIDS, MI 49501 (616) 632-6888

DEFENDANT 3

MICHIGAN DMV DEPARTMENT OF MOTOR VEHICLES

7064 Crowner Drive Lansing, Michigan 48918

DEFENDANT 4

STEPHANY LEE BYROM

Address is Unknown
616.308-6061

DEFENDANT 5

TAMERA BETTIE MORGAN

216 Barnett Street Northeast
Grand Rapids, MI 49503-1004 Telephone unknown

DEFENDANT 6

KENT COUNTY SHERIFF

701 BALL AVENUE GRAND RAPIDS MICHIGAN 49503 616.63.6100

FEDERAL QUESTIONS

1. Do court orders that lack judicial authority, specifically those issued coram non judic, infringe upon the separation of powers, do these orders also lack both subject matter and personal jurisdiction over the matter at hand? Additionally, do the outcomes of such orders, THAT result in unreasonable searches, seizures, arrests, and imprisonment of the Suitor, infringe upon the Suitor's protected and secured Fourth Amendment rights, interests, liberties, and immunities?
2. Can the enforcement of child support, which involves STATE OF MICHIGAN INSTRUMENTALITIES/STATE ACTORS, be regarded as a criminal act that potentially grants these entities the authority to infringe upon the Suitor's Fourth and Fifth Amendment secured and protected due process rights, including protection against unreasonable search and seizure, unlawful arrest, and unlawful imprisonment, thereby raising concerns about the separation of powers?
3. Do STATE OF MICHIGAN legislative CHILD SUPPORT laws, TITLE IV-D rules and other child support enforcement codes and statutes, grant agents, employees, officers acting in official capacity under color of law the authority to violate the Suitor's FIFTH and FOURTEENTH Amendment DUE PROCESS rights, which secure protections, by unlawfully enforcing the status of SUITOR as the legal father, non-custodial parent, and obligor without evidence of genetic testing of the children, even when SUITOR did not enroll in services, did not sign a contract, and when such enforcement potentially leads to other constitutional violations?
4. Is the administrative process of child support unconstitutional when the Suitor never enrolled in child support Title IV-D services, never provided his Social Security number, and yet his personal information was obtained and used without his consent? Does this constitute a violation of the Suitor's Fourth Amendment-protected and secured right to be free from unreasonable Searches and Seizures, along with potential additional constitutional violations?
5. If the Suitor's personal information was used to establish him as financially responsible for a child without his consent or enrollment, and he was compelled to take on this financial responsibility, potentially against his will, have the Suitor's protected and secured Fifth Amendment rights against self-incrimination been violated, in addition to potential other constitutional violations?

I. JUDICIAL NOTICE

I, Solon-keith respectfully requests this Judicial branch to take judicial notice of my pro se complaint, which means that I am appearing in this legal matter without legal representation and lack formal legal training or a license to practice law. In light of this, I urge the Judicial branch to construe my pleadings liberally, consistent with established constitutional principles. This liberal construction principle is affirmed in *Haines v. Kerner*, 404 U.S. 519 (1972), where the Supreme Court emphasized that pro se complaints, regardless of any technical deficiencies to not be held to the same stringent standards as attorneys, and that the pleadings should be interpreted liberally to ensure access to the courts, See grounded in *Conley v. Gibson*, 355 U.S. 41, 45-46 (1957), where the Supreme Court held that “a pro se complaint can only be dismissed for failure to state a claim if it appears 'beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.' This lenient standard ensures that pro se litigants are not unfairly disadvantaged due to their lack of legal training”.

Furthermore, I firmly believe that this Constitutional court bears a solemn responsibility and a legal duty to safeguard and uphold all constitutional and equitable rights and interests, as enshrined in **United States v. Lee**, 106 U.S. 196, 220 (1882), The duty to protect individuals from violations of federal constitutional rights extends to state courts, as articulated in *Goss v. State of Illinois*, 312 F.2d 257 (7th Cir. 1963), where it was affirmed that state judges, like federal judges, are obligated to respect and defend federal constitutional rights, “*State judges, as well as federal, have the responsibility to respect and protect persons from violation of federal constitutional rights*”, **Goss v. State of Illinois**, 312 F.2d 257 (7th Cir. 1963).

Furthermore, Federal Rule of Civil Procedure 8 directs that pleadings shall be construed in a manner that promotes substantial justice. The Supreme Court has consistently emphasized that pro se pleadings are to be afforded a liberal construction, as seen in *Baldwin County Welcome Center v. Brown*, 466 U.S. 147 (1984), where the Court recognized the need for 'special solicitude' towards pro se plaintiffs. This approach reflects the principle that the court should assist pro se litigants in navigating the legal process to ensure that their access to justice is meaningful and effective.

In light of these well-established legal principles and precedents, I respectfully request that the Judicial branch take into consideration my pro se complaint and the corresponding need for a liberal construction of my pleadings in order to ensure that justice is served in this matter.

JUDICIAL COGNIZANCE

It is an established principle that judges are entrusted with the duty to uphold the highest standards of judicial performance, placing particular emphasis on the fair and impartial conduct of litigation. As aptly articulated by Judge Aldrich in *In re Union Leader Corp.*, judges are bound by the imperative of conducting legal proceedings with scrupulous fairness and unwavering impartiality. This foundational tenet reflects not only a cornerstone of the legal profession but also the very essence of justice itself.

The right to be tried before an unbiased judge is undeniably fundamental in the judicial system. This principle, grounded in the broader interest of justice, resonates throughout the lawful landscape. It is enshrined in federal law, as articulated in 28 USCA § 2411, which underscores the imperative of

impartiality in judicial proceedings. Furthermore, it finds expression in judicial decisions such as *Pfizer v. Lord*, 456 F.2d 532 (cert. denied 92 S. Ct. 2411; US Ct. App. MN, 1972), where the courts have consistently reaffirmed the bedrock importance of a fair and unbiased judicial process.

Importantly, this commitment to impartiality extends beyond federal courts to state courts. State judges, just as their federal counterparts, bear the solemn responsibility to uphold, respect, and protect individuals from violations of their constitutional rights. This principle, as emphasized in *Gross v. State of Illinois*, 312 F.2d 257 (1963), underscores the universal obligation of judges to safeguard and preserve the constitutional rights of the American people. The judiciary's commitment to fairness, impartiality, and the protection of constitutional rights is a linchpin of the legal system. It is a commitment enshrined in both federal and state law, as well as firmly entrenched in judicial precedent. As such, it is incumbent upon the judiciary at all levels to uphold these principles in order to ensure the integrity of our justice system and the preservation of the American people rights and interests. *See Exhibit E) Notice Verifications of all court documents + Exhibit F) Notice Attorney's can't testify and demand for verification of all court documents by attorney.*

II. VALID CLAIM FOR RELIEF

This pro se complaint asserts a meritorious claim for relief based on compelling constitutional and equitable grounds. The allegations set forth in this pro se complaint contend that the DEFENDANTS, acting through their agents on behalf of the STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY, in conjunction with the MICHIGAN DMV DEPARTMENT OF MOTOR VEHICLES, and various Public Officers of the 17TH CIRCUIT COURT ADMINISTRATIVE TRIBUNAL through THE STATE OF MICHIGAN STATE PROSECUTOR, have deliberately, intentionally, and knowingly engaged in actions that have transgressed constitutionally protected, secured, protected and guaranteed rights and interests. These actions have been taken under the weight of proper basis which supports the allegation being made, collectively and/or individually constituting a violation of the constitutional rights and interests standing as an American.

The constitutional and equitable foundation underpinning these claims is firmly established in both constitutional, federal law, treaty and judicial precedent. Courts at the highest levels have consistently recognized the imperative of safeguarding the American people constitutional rights and interests. Cases such as *Tennessee v. Garner*, 471 U.S. 1 (1985), *Graham v. Connor*, 490 U.S. 386 (1989), *Albright v. Oliver*, 510 U.S. 266 (1994), *Deitrich v. Burrows*, 167 F.3d 1007, 1013 (6th Cir. 1999), *Olson v. Tyler*, 771 F.2d 277 (7th Cir. 1985), *Knowles v. Iowa*, 119 S.Ct. 484 (1998), *Wyoming v. Houghton*, 119 S.Ct. 1297 (1999), *Kalina v. Fletcher*, 118 S.Ct. 502 (1997), *Hill v. McIntyre*, 884 F.2d 271, 275 (6th Cir. 1989), and *Bruning v. Pixler*, 949 F.2d 352, 357 (10th Cir. 1991) have reiterated the paramount importance of upholding constitutional rights and interests even in the face of government actions.

Moreover, the duty to enforce the Constitution of the United States for America on behalf of every American beneficiary of the Republic, ensuring the protection of the rights, interest, liberties and immunities guaranteed to them by the Constitution of the United States for America, is underscored by legal precedent such as *Monell v. Department of Soc. Svcs.*, 436 U.S. 658 (1978).

This pro se complaint asserts a valid claim for relief grounded in the fundamental principles of constitutional and equitable protection for my personal rights, liberties, immunities and interest. The actions alleged herein, constitutes a serious breach of those rights, liberties, immunities and interests as

recognized by established constitutional and equitable precedents, calling for redress and the preservation of the constitutional fabric of this system.

III. JURISDICTION

The suitor invokes a multifaceted jurisdiction under Article III of the Union States Republic, demonstrating a commitment to constitutional, equity, and common law principles, all of which operate harmoniously within the provisions of 28 U.S.C. § 1333.

- **Constitutional Jurisdiction:** Article III of the Constitution of the United States for America grants federal courts jurisdiction over cases arising under the "Constitution, laws, and treaties of the United States. In this instance, the suitor's claim raises fundamental questions related to federal constitutional rights or issues that directly implicate constitutional protections. Thus, invoking constitutional jurisdiction under Article III provides the legal foundation for addressing these critical matters.
- **Equity Jurisdiction:** Equity jurisprudence, steeped in principles of fairness and justice, complements the constitutional dimension of this case. The suitor's invocation of equity jurisdiction underscores the commitment to achieving just and equitable outcomes in constitutional matters.
- **Common Law Jurisdiction:** Common Law jurisdiction may be invoked to address aspects of the case that relate to traditional legal doctrines, such as torts, contracts, or property rights, that intersect with constitutional and equitable considerations. This approach allows for a comprehensive examination of all relevant legal principles.
- **Federal Question Jurisdiction:** Article III of the Constitution grants federal courts jurisdiction over cases arising under the "Constitution, laws, and treaties of the United States." This means that federal courts have the authority to hear cases that involve federal constitutional issues. The Suitor's claim raises a federal constitutional question, and serves as a basis for federal jurisdiction under Article III.

The jurisdiction of this Federal court is properly invoked in this action pursuant to 28 U.S.C § 1331, as it squarely involves a federal question. Section 1331 provides the foundation for the district courts original jurisdiction over civil actions arising under the Constitution, laws, and treaties of the United States. This jurisdictional grant is fundamental to the federal court system's role in ensuring the uniform application of federal law.

Additionally, under 28 U.S.C. § 1367(a), which governs supplemental jurisdiction, when a district court has original jurisdiction over a civil action, it shall have supplemental jurisdiction over all other claims in the action within such original jurisdiction that they form part of the same case or controversy under Article III of the Constitution. This means that the court has the authority to adjudicate not only the federal question central to the case but also any related claims that are part of the same overarching redress.

In this matter, the controversy at hand exceeds the sum of \$50,000, thereby meeting the Congressional threshold for invoking federal jurisdiction. Furthermore, the nature of the redress involves FOREIGN CORPORATE CITIZENS OF A STATE, the DEFENDANTS, and a Private Sovereign man, Solon-keith. This complex mix of parties and claims necessitates the expertise and jurisdictional reach of this Federal court.

Crucially, Article 50 of the International Convention on Civil and Political Rights, as established by UN Resolution (2200A), articulates a principle of paramount importance. It proclaims that the provisions of the present covenant shall extend to all parts of all federal states, without limitations or exceptions. This underscores the global significance of the rights enshrined within the Covenant, which are intended to apply universally, even within the confines of federal systems.

The Private man, Solon-keith herein asserts that the DEFENDANTS have transgressed my rights, interests, liberties and immunities, and the laws contained within the Covenant. Additionally, the Restatement (Third) of Foreign Relations Law of the United States, specifically at Restatement § 111, comment d, clarifies that international law is also the law of every State . . . , highlighting the integration of international law principles into domestic legal systems. This principle is further affirmed by id. § 702, comment c, which recognizes that the customary law of human rights, interest, liberties and immunities is part of the law of America to be applied as such by State as well as federal courts.'

In light of these legal foundations and precedents, it is evident that this Federal court's jurisdiction is not only appropriate but also essential in ensuring the protection of rights, interests, liberties, immunities, and the fair resolution of this multi-faceted redress involving international equitable principles.

I, Solon-keith invocation of constitutional, equity, and common law jurisdiction **under Article III of the Union States Republic** underscores the complexity and depth of the legal issues at hand. This multifaceted approach ensures that this redress is considered from various lawful perspectives, embracing the principles of justice, fairness, constitutional rights, and established legal doctrines. The harmonious interaction of these legal realms within the provisions of 28 U.S.C. § 1333 serves to uphold the Suitor's rights and interest, and provide a comprehensive framework for the resolution of this multifaceted matter.

- Where it was concluded by that court (9th Circuit) that "the people" are not bound by codes, rules regulations and ordinances, being mere private acts of laws, but are inescapably and "forever" bound by the law of the land, being the general laws, and entitled to the free exercise of all processes provided by the general law of the land, which have been protected and secured by the several state constitutions as foundational, organic law and shall never be compromised. [Rodrigues v Secretary of Labor. Donovan. 769 F.2nd 1344 (1985)]
- To disregard Constitutional law, and to violate the same, creates a sure liability upon the one involved: "State officers may be held personally liable for damages based upon actions taken in their official capacities." [Hafer v. Melo, 502 U.S. 21 (1991)].
- "the party who brings a suit is master to decide what law he will rely upon, and . . . does determine whether he will bring a 'suit arising under' the . . . [Constitution or laws] of the United States by his declaration or bill.; see Bell v. Hood, 327 U.S. 678 (1946).

- "It authorizes any person, who is deprived of any right, privilege, or immunity secured to him by the Constitution of the United States, to bring an action against the wrong-doer in the Federal courts and that without any limit whatsoever as to the amount in controversy. The deprivation may be of the slightest conceivable character, See MONROE ET AL. v PAPE ET AL.

IV. SUITS FOR PROSPECTIVE RELIEF

In the realm of seeking prospective relief through redress, three key legal avenues are instrumental in upholding constitutional protected and secured rights, interests and immunities.

1. **Private Cause of Action Under Federal Statutes:** First, Suitor actions for prospective relief directly under constitutional and equitable expressly establishes a private cause of action. In this cases, the constitution, federal law and treaties creates the proper basis for seeking remedies aimed at preventing future harm or violations. A notable precedent in this regard is 'The Cone Corporation v. Florida Dept. Transportation, 921 F.2d 1190, 1201 (11th Cir.), cert. denied 500 U.S. 942 (1991). Such actions are a means to enforce the rights, interest, immunities and liberties, and obligations articulated when remedies are warranted.
2. **Section 1983 Claims for Federal Rights Violations:** Second, suits for prospective relief is brought under 42 U.S.C. § 1983, that establishes a cause of action for violations and infringement upon of rights, liberties, interest and immunities secured by the Constitution of the United States for America, Declaration of Independence. The U.S. Supreme Court decision in *Rosado v. Wyman*, 397 U.S. 397 (1970) reinforced the significance of Section 1983 in safeguarding federal rights. Additionally, legal scholarship, such as the work by R. Capistrano in 'Enforcing Federal Rights: The Law of Section 1983, 33 Clearinghouse Rev. 217 (1999), has contributed to a deeper understanding of the practical applications and nuances of Section 1983 claims. These claims encompass a broad spectrum of constitutional and equitable rights and interests, and they empower Suitor to seek remedies when government OFFICIALS, OFFICERS and AGENTS actions and/or policies threaten my rights, liberties, interest and immunities.
3. **The Due Process Clause of the Fourteenth Amendment to the United States Constitution** for America stands as a sentinel of protection for the rights, liberties, immunities and interests of the American people against potential abuses of federal and state government power. This constitutional provision unequivocally declares that no state shall, under any circumstances, 'deprive any person of life, liberty, or property, without due process of law.' (Constitution of the United States for America XIV, §1). Embedded within this constitutional safeguard is a fundamental principle articulated through judicial precedent: "*Where there is a legal right, there is also a legal remedy*". This celebrated maxim, often attributed to the landmark case of '*Marbury v. Madison*, 5 U.S. 137, 163 (1803),' is deemed the very essence of liberty within the legal system. It reflects a cornerstone principle that underpins the rule of law: the notion that substantive legal rights, once recognized, carry with them an implicit commitment to provide recourse and relief when those rights, interest, liberties and immunities are infringed upon.

In essence, 'Marbury v. Madison' affirmed *that every injury inflicted upon an individual necessitates 'proper redress.'* Justice and fairness demand that when rights, interests and immunities are violated, the injured party must have access to the judicial system to seek redress and rectify the harm suffered. This principle, deeply rooted in American jurisprudence, ensures that the American people are not left defenseless in the face of government OFFICIALS, OFFICERS and agents actions that threaten their life, liberty, property and pursuit of happiness.

Thus, the Due Process Clause serves as both a constitutional guarantee and a call to action. It enshrines the concept of due process as a bulwark against arbitrary state actions, and the maxim it embodies reinforces the indivisible link between legal rights and the availability of equitable and legal remedies. Together, these principles underscore the enduring commitment of our legal system to safeguard Solon-keith liberties, rights, interest and immunities are upheld by the rule of law.

More importantly, the presumed availability of federal equitable relief against threatened invasions of constitutional interests, liberties, immunities and rights appears entirely to negate the contention that the status of an interest as constitutionally protected divests federal courts of the power to grant damages absent express congressional authorization. Congress provided specially for the exercise of equitable remedial powers by federal courts, see Act of May 8, 1792, § 2, 1 Stat. 276; C. Wright, *Law of Federal Courts* 257 (2d ed., 1970), in part because of the limited availability of equitable remedies in state courts in the early days of the Republic. See *Guaranty Trust Co. v. York*, 326 U. S. 99, 326 U. S. 104-105 (1945). And this Court's decisions make clear that, at least absent congressional restrictions, the scope of equitable remedial discretion is to be determined according to the distinctive historical traditions of equity as an institution, *Holmberg v. Armbrrecht*, 327 U. S. 392, 327 U. S. 395-396 (1946); *Sprague v. Ticonic National Bank*, 307 U. S. 161, 307 U. S. 165-166 (1939). The reach of a federal district court's "inherent equitable powers," *Textile Workers v. Lincoln Mills*, 353 U. S. 448, 353 U. S. 460 (Burton, J., concurring in result), is broad indeed, e.g., *Swann v. Charlotte-Mecklenburg Board of Education*, 401 U. S. 1 (1971); nonetheless, the federal judiciary is not empowered to grant equitable relief in the absence of congressional action extending jurisdiction over the subject matter of the suit. See *Textile Workers v. Lincoln Mills*, *supra*, at 353 U. S. 460 (Burton, J., concurring in result); Katz, 117 U.Pa.L.Rev. at 43.

V. CLAIM of RIGHT

This action is brought forth under the purview of 42 U.S.C. § 1983 and 42 U.S.C. § 14141 (§ 14141) bearing profound implications for the pursuit of justice and the safeguarding of constitutional rights, interest, liberties and immunities. 42 U.S.C. § 1983 serves to address violations of rights, interests, liberties and immunities secured by the Constitution of the United States for America, treaties and federal laws. Under its aegis, the American people are empowered to seek redress when their constitutional protected and secured rights, liberties, immunities and interests have been transgressed upon. It stands as a beacon of accountability, holding state actors accountable for their actions and providing a mechanism for the American people to pursue equitable remedies. Section 1983 actions resonate for addressing constitutional infringements, invoking the principles of justice, fairness, and constitutional integrity.

42 U.S.C. § 14141 (§ 14141) targets and rectifies patterns or practices of conduct by state actors that deprived Solon-keith of his rights, interest, liberties and immunities. Section 14141 is an unequivocal

assertion of federal authority, and its profound implications extend to the imposition of vicarious liability on the STATE OF MICHIGAN OF THE UNITED STATES for the actions of its STATE ACTORS.

1. **Vicarious Liability:** Under vicarious liability holds the STATE OF MICHIGAN OF THE UNITED STATES accountable for the actions of its officials, officers, and agents thus ensuring that the government entity bears responsibility for any constitutional violations committed by its officials, officers and agents. This doctrine serves to underscore the government's duty to uphold constitutional standards and provides a mechanism for the American people to seek redress when their rights, interests, liberties and immunities are infringed upon. This promotes accountability and justice in cases involving governmental misconduct.

In this action, the DEFENDANTS, operating under the auspices of the STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY, in conjunction with the MICHIGAN DMV DEPARTMENT OF MOTOR VEHICLES, and various Public Officers of the 17TH CIRCUIT COURT ADMINISTRATIVE TRIBUNAL through THE STATE OF MICHIGAN STATE PROSECUTOR, stand accused of actions that have allegedly infringed upon the constitutional and equitable rights, liberties, interests and immunities of Solon-Keith. This lawful redress endeavor seeks relief, including equitable remedies, to rectify the alleged violations and to restore the integrity of constitutional protections.

- The Court today simply recognizes what has long been implicit in our decisions concerning equitable relief and remedies implied from statutory schemes; i.e., that a court of law vested with jurisdiction over the subject matter of a suit has the power -- and therefore the duty -- to make principled choices among traditional judicial remedies. Whether special prophylactic measures -- which at least arguably the exclusionary rule exemplifies, see Hill, The Bill of Rights and the Supervisory Power, 69 Col.L.Rev. 181, 182-185 (1969) -- are supportable on grounds other than a court's competence to select among traditional judicial remedies to make good the wrong done, cf. Bell v. Hood, supra, at 327 U. S. 684.

PART I PARLIAMENTARY LAW AND RULES CHAPTER 1 RULES GOVERNING PROCEDURE

Sec. 3. Each House Determines the Rules of Its Own Proceedings and Sec.16. Fraud Will Invalidate Acts

- Where there is more than a mere technical violation of the rules of procedure, the violation may invalidate the act, and an act will be invalidated where there is fraud or bad faith, and

Sec.48. Limitations on Powers

- If CONGRESS OR A STATE LEGISLATURE violates a constitutional requirement, the courts will declare its act void.
- Constitutional provisions prescribing exact times and methods are mandatory.

- When there is a limit imposed on the powers of a body, it must conform to those limits, and when it acts under a delegation of power, it must act strictly within the limits of the power conferred upon it by the authority that created.

VI. VENUE

Venue is proper under 28 U.S.C. 1391 (e), in that all corporate defendants have their primary corporate headquarters located within the united states, Michigan, western district, private residence, private domicile within the united states, Michigan, western district. A substantial part of the events giving rise to the claims herein arose within the above-mentioned locations.

VII. STATUS & STANDING

I, Solon-keith am, a Natural Man, Private standing as an American. I am indigenous to this land now called America, within the meaning of the description of the Draft for International Declaration of the Rights of Indigenous Peoples at Article 1 Definition. Misclassifying the Natural Man and converting the Natural Man into what is called a "SOVEREIGN CITIZEN" and/or "ARTIFICIAL PERSON" is disparity of my rights. I, Solon-keith at all times must be identified as a Natural Man not a statutory conversion into an artificial being, invisible, intangible, and existing only in contemplation of the law see **People v.**

Powell 280 Mich. 699 (Mich. 1937), See Exhibit A) AFFIDAVIT and Petition of Waiver of Court Fees, Exhibit C) Affidavit of Declaration of Non-U.S. Citizen & Declaration of Foreign Neutral In Intinere Status, D) Affidavit of denial of corporate existence.

NOTICE OF DEMAND FOR FAIR TRIAL

I Solon-keith, in invoking a fair warning due process claim, demonstrates a vigilant commitment to safeguarding my rights, interest, liberties and immunities against potential infringements, deprivations, or violations, as well as any instances of gross negligence that might imperil the fundamental right to a fair trial. This NOTICE serves as a preeminent safeguard, ensuring that the bedrock principles of due process and the right to a fair trial remain inviolate.

I, Solon-keith, fervently demands the preservation of constitutionally protected and secured rights, interests, immunities, liberties and interests enshrined within the Sixth Amendment of the CONSTITUTION OF THE UNITED STATES FOR AMERICA. Central among these rights is the sacrosanct guarantee of a fair trial. This constitutionally fortified right is the cornerstone of the American legal system, and its preservation is paramount. Under the aegis of Constitutional law, as recognized and upheld within the framework of Article III of the Union States Republic, I, Solon-keith seeks to reaffirm and defend these protected and secured constitutional rights, interests, liberties and immunities. This invocation underscores the enduring relevance and vitality of Constitutional law principles in upholding equitable liberties and ensuring that due process prevails.

I Solon-keith expectations are clear and resonate with the tenets of judicial duty. I Solon-keith firmly believe that the Judicial Officer presiding over this matter will provide an impartial forum, thereby fulfilling the core obligations of their judicial office. This commitment to impartiality is intrinsic to the administration of justice, ensuring that all parties are afforded a fair and unbiased proceeding.

In essence, this statement encapsulates, I, Solon-Keith unwavering dedication to the principles of fairness, justice, and constitutional integrity. It serves as a poignant reminder that the American legal system is rooted in the protection of rights, interest, liberties and immunities and the equitable pursuit of justice. It is a testament to the enduring commitment of the American legal system to uphold the rule of law and ensure that **I am afforded constitutionally mandated right to a fair trial.**

VIII. GROUNDS FOR THE CLAIM

- (See Exhibit B) Background Affidavit Statement of Facts, + Exhibit G) Affidavit of Specific Negative Allegement*
- "A cause of action does not consist of facts, but of the unlawful violation of a right which the facts show. *United Mine Workers of America v. Gibbs*, 383 U.S. 715 (1966).
 - In the sense of judicial power, exists whenever there is a claim "arising under [t]he Constitution, the Laws of the United States, and Treaties made, or which shall be made, under their Authority . . .," U.S. Const., Art. III, § 2. *United Mine Workers of America v. Gibbs*, 383 U.S. 715 (1966)

The grounds for this claim include but not limited to the violation to wit.

FIRST CLAIM FOR RELIEF:

**BREACH OF OATH OF OFFICE.
LACK OF SUBJECT MATTER JURISDICTION
CONSPIRACY AGAINST RIGHTS
OPERATING UNDER COLOR OF AUTHORITY
VIOLATION OF SEPARATION OF POWERS
LEADING TO DUE PROCESS VIOLATIONS**

The allegations against the DEFENDANTS actions revolve around the encroachment of the administrative child support process into the domain of the judicial branch. This encroachment is significant not only in its potential impact on Solon-Keith rights, interests, liberties and immunities, but also in its implications for the separation of powers doctrine, which forms the bedrock of the system of Republican form of government. The separation of powers principle is designed to ensure that each branch of government operates within its designated sphere of authority, preventing overreach and maintaining the delicate balance of power. As **Holmburg v. Holmburg**, found that CHILD SUPPORT ADMINISTRATION violated the separation of powers principle. *"The administrative child support process governed by Minn. Stat. 518.5511 (1996) is unconstitutional because it violates the separation of powers required by Minn. Const. art. III, 1."* *The administrative child support process created by Minn. Stat. 518.5511 (1996) violates the separation of powers doctrine by infringing on the district court's original jurisdiction, by creating a tribunal which is not inferior to the district court, and by permitting child support officers to practice law.*

Defendants mean OFFICIALS, OFFICERS and AGENTS acting on behalf of STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY, in conjunction with the MICHIGAN DMV DEPARTMENT OF MOTOR VEHICLES, and various Public Officers of the 17TH CIRCUIT COURT ADMINISTRATIVE TRIBUNAL THE STATE OF MICHIGAN STATE PROSECUTOR and KENT COUNTY SHERIFS

Central to these allegations is the violation of DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*) breaching of the oath of office; the solemn commitment taken by public officials, officers and agents to uphold and defend the Constitution of the United States for America, and to faithfully discharge their duties when they are accused of breaching this oath. **In America, the public officer's/officials oath originates within the United States Constitution for America (Appendix A).** *The title of executive officers mentioned in the constitution refers to DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) working under the executive branch of the government. In the United States Constitution for America under Article IV it states: "The Senators and Representatives before mentioned, and the Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and the several States, shall be bound by Oath or Affirmation, to support this Constitution..."* **The American Dictionary of the English Language, define an oath as,** *"A solemn affirmation or declaration made with an appeal to God for truth of what is affirmed. The appeal to God in a oath, implies that the person imprecates his vengeance and renounces his favor if the declaration is false, or if the declaration is a promise, the person invokes the vengeance of God if he should fail to fulfill it. A false oath is called perjury."*

DEFENDANTS, (*excluding Stephany Byrom and Tamera Morgan*), having taken an oath to support and defend the United States and the United States Constitution for America, thereby it is contended that their actions were not inadvertent or accidental rather, they were executed willfully, knowingly, and intentionally, and did deny, deprive, intrude, and infringe upon I, Solon-keith fundamental rights, family privacy (*"There is a family right to privacy which the state cannot invade or it becomes actionable for civil rights damages, see Griswold v. Connecticut, 381 US 479, (1965), property rights, interest and liberties as follows...*

- To manage the financial care of my children,
- To make choices about my family integrity of my children's upbringing, their well-being, their needs, their safety, their education, their healthcare, their nutrition, their basic necessities, their housing without undue interference from the government or external parties, *"The rights of parents to the care, custody and nurture of their children is of such character that it cannot be denied without violating those fundamental principles of justice which lie at the base of all our civil and political institutions, and such right is a fundamental right protected by this amendment (First) and Amendments 5, 9, and 14". Doe v. Irwin, 441 F Supp 1247; U.S. D.C. of Michigan, (1985).*

DEFENDANTS, (*excluding Stephany Byrom and Tamera Morgan*) have a duty to uphold their oath of office, which includes following the law and protecting the rights of I, Solon-keith in which DEFENDANTS, (*excluding Stephany Byrom and Tamera Morgan*) have failed to do so thru the following actions:

1. **Administrative Law Judges (ALJs) Acting as Judicial Judges.** The administrative child support process under color of authority permitted administrative law Judges IN recurring patterns and practices to act in the false capacity as a judicial officer to make determinations on the fitness of Solon-keith conscious capacity to companionship, caring, managing my children's well-being, see The United States Supreme Court noted that a *parent's right to "the companionship, care, custody and management of his or her children" is an interest* " **May v. Anderson, 345 US 528, 533; 73 S Ct 840,843, (1952)** and *"A parent's right to care and companionship of his or her children are so fundamental, as to be guaranteed protection under the First, Ninth, and Fourteenth Amendments of the United States Constitution"*, **in re: J.S. and C.,324 A 2d 90; supra 129 NJ Super, at 489.**

DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) actions did infringe on my unalienable rights and interests without appropriate due process under judicial oversight. DEFENDANTS, (excluding Stephany Byrom and Tamera Morgan) acting under child support administrative processes actions that are a Separation of Powers violation. DEFENDANTS, (excluding Stephany Byrom and Tamera Morgan) through administrative child support processes in recurring practice and pattern granted administrative law judges to serves as part of the executive branch to make legal determination by transferring judicial power to the executive branch. In doing so, DEFENDANTS, (excluding Stephany Byrom and Tamera Morgan) through administrative child support processes under color of authority permitted administrative law judges to act beyond their designated constitutional authority to infringe upon the judicial branch's role breaching their oath to uphold to defend the United States and Constitution of the United States for America, and transgress against my natural rights as a conscious father.

- *The right of a parent not to be deprived of parental rights without a showing of fitness, abandonment or substantial neglect is so fundamental and basic as to rank among the rights contained in this 9th Amendment.*

2. ACTING UNDER PRESUMPTION. ACTING UNDER PRESUMPTION OF OBLIGATION IS ACTING UNDER COLOR OF LAW AND VIOLATION OF DUE PROCESS: The DEFENDANTS, did falsely assume that I, Solon-keith as an unfit, unwilling, unsuitable parent and unable to protect my children well-being without presenting a high standard of proof or concrete evidence into the record. The DEFENDANTS must have a compelling legal reason to protect the welfare of children where a parent is available for the care, custody, and control of their minor children. No compelling legal reason was presented into the record, and false statements individually made by Stephany Byrom and Tamera Morgan are not compelling reasons to intrude into my private affairs.

The DEFENDANTS did create a child support obligation contract under the assumption that I, Solon-keith is an unfit, unwilling, unsuitable parent and unable to protect my children well-being, and fraudulently created a contract stipulating I, Solon-keith as an OBLIGOR and PAYER without my authority or consent. Furthermore, Stephany Byrom and Tamera Morgan individually volunteered to create a contract under the guise of fraud with the DEFENDANTS where they conspired to extort money from me.

The DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) actions of making determinations about I, Solon-keith parental fitness and assuming without proper evidence and due process under judicial oversight in recurring practice and pattern of operating UNDER COLOR OF LAW and COLOR OF AUTHORITY. A fundamental principle is *the presumption of innocence*. This means that I, Solon-keith is innocent until proven guilty. This principle applies to parental fitness, and DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) presuming parental unfitness without proper evidence and due process under judicial oversight, acting in a manner that unjustly presumes parental unfitness without concrete evidence under perjury is breach of the public official's oath of office. DEFENDANTS, (excluding Stephany Byrom

and Tamera Morgan) failure to uphold the principles of fairness, impartiality, and adherence to the law, which are fundamental to their role is BREACH OF OATH OF OFFICE.

3. **Child Support Officers and Agents permitted to practice law.** DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*), STATE OF MICHIGAN OF THE UNITED STATES by and thru PUBLIC OFFICIALS and PUBLIC OFFICERS who are PUBLIC TRUSTEES OF THE PUBLIC TRUST did act under color of authority to delegate legislative authority THAT permits agents in recurring practice and patterns to practice law without a license effectively bypassing legislative oversight violating the Separation of Powers Principle thereby, Breaching their Oath of Office. When non-attorney agents FOR FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY actively participate in THE legal proceedings OF child support hearings and present evidence, examine witnesses, giving legal advice to Stephany Byrom and Tamera Morgan involved in a legal matter, and make legal arguments, they are essentially engaging in the practice of law.

AGENTS acting for FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY actively participated in the proceedings by presenting evidence, questioning I, Solon-keith, and making legal arguments on behalf of the Stephany Byrom and Tamera Morgan individually. During the ADMINISTRATIVE CHILD SUPPORT hearings, these agents introduced hearsay information into the record. This hearsay evidence was not based on firsthand knowledge but rather on statements and information provided by third parties, Stephany Byrom and Tamera Morgan individually. The agents did not take an oath to tell the truth and did not subject themselves to the penalties of perjury while presenting the hearsay evidence. They operated without the same legal obligations as sworn witnesses. The introduction of hearsay evidence without proper authentication and the failure to swear in the agents is a due process violation. The Fifth Amendment to the U.S. Constitution for America guarantees “*that no person shall be deprived of life, liberty, or property without due process of law*”. Due process includes the right to a fair and impartial hearing where reliable evidence is presented. The use of hearsay evidence without proper safeguards infringed upon the due process rights of I, Solon-keith. The agents acted as prosecuting attorneys, their presentation of hearsay evidence without the opportunity for I, Solon-keith to confront and cross-examine the sources of that hearsay violates the Sixth Amendment's Confrontation Clause. This clause guarantees the right of the accused in a criminal case to confront and cross-examine witnesses against them. Being that the agents are acting as quasi-legal representatives for Stephany Byrom and Tamera Morgan individually and not providing the same representation to I, Solon-keith, is equal protection violation under the Declaration of Independence and Fourteenth Amendment. The involvement of agents representing one party Stephany Byrom and Tamera Morgan in a quasi-legal capacity while participating in the adjudication process compromises the impartiality of the proceedings. The right to an impartial tribunal is a fundamental aspect of due process, and thereby is a Breach of Oath of Office.

4. Lack of Subject Matter Jurisdiction. Lack of Judicial Review:

The DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*), in the context of administrative child support proceedings, engaged in the adjudication of cases before individuals who were not duly appointed judges or non-judicial court officers. These proceedings were conducted in a manner that rendered them void coram non judge, effectively outside the jurisdiction of competent judges and judicial officers. As a result of this administrative approach, I, Solon-keith's access to the courts for proper review and redress was unjustly denied and discouraged.

- a) **Denial of Due Process (Fifth Amendment):** By conducting administrative child support proceedings without the involvement of properly appointed judges and judicial officers, the DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*), violated I, Solon-keith's right to due process under the Fifth Amendment of the U.S. Constitution for America. Due process requires fair and impartial proceedings must be conducted by qualified officials.
- b) **Separation of Powers Violation:** The DEFENDANTS' (*excluding Stephany Byrom and Tamera Morgan*) actions, by assuming judicial roles and adjudicating cases in an administrative capacity did breach the separation of powers principle. The Constitution of the United States for America allocates distinct powers to each branch of government, and the adjudication of this matter falls under the purview of the judicial branch. This administrative encroachment on the judiciary's authority is a violation of the separation of powers doctrine.
- c) **Access to the Courts (First Amendment):** Denying I, Solon-keith the opportunity to access the courts for review of administrative decisions implicates the First Amendment's protection of the right to petition the government for redress of grievances. This denial of access to the judicial branch for oversight and natural justice is a violation of this fundamental right.
- d) **Oath of Office Violation:** Public officials involved in these administrative proceedings, who assumed roles reserved for the judiciary, did breach their oath of office. Public officials are required to uphold the Constitution of the United States for America and respect the boundaries of their respective branches. Engaging in actions that infringe upon the judicial branch's authority did constitute a breach of their oath to uphold the Constitution of the United States of America.
- e) **Lack of Subject Matter and Territorial Jurisdiction:** The DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*) actions were marked by a clear absence of subject matter and territorial jurisdiction and authority. Any proceedings or judgments conducted coram non judge, that is, outside the proper jurisdiction and authority, are inherently void and necessitate nullification. It is an established legal principle that before the issuance of any money judgment, such as a SUPPORT ORDER, the court must unequivocally demonstrate its authority, both in terms of personal and subject matter jurisdiction, to issue such a judgment.
- f) **Violation of Due Process (Fifth Amendment):** The DEFENDANTS' (*excluding Stephany Byrom and Tamera Morgan*) failure to ensure that the court had the requisite authority and subject matter jurisdiction before issuing a money judgment did violate the due process rights of I, Solon-keith. Due process mandates that legal proceedings be conducted fairly and impartially, with proper jurisdiction being a fundamental component of this fairness. One critical element of due process is the requirement that Stephany Byrom and Tamera Morgan individually initiated legal proceedings and failed to demonstrate an actual injury in fact. This requirement is essential to establish standing, which is the legal authority to bring a case. Without a verified complaint by Stephany Byrom and Tamera Morgan individually that includes evidence of an actual injury, they

lacked standing to pursue any legal action. Thereby there is no legitimate legal interest in the case.

- *"Standing represents a jurisdictional requirement which remains open to review at all stages of the litigation." National Organization for Women, Inc., v. Scheidler, 510 US 249.*
- *"The doctrine of standing prohibits a litigant [THE DEFENDANTS from raising another's legal rights. Allen v. Wright, 468 US 737, 750-751." Huberman v. Public Power Supply System, 744 P.2d 1032, 1055.*
- *"lacks standing to bring a suit, courts lack jurisdiction to consider it." High Tide Seafoods v. State, 725 P.2d 411, 415 (Wash. 1986).*
- *Injury in fact element of standing is satisfied when a plaintiff ["STATE OF FLORIDA DOR"] alleged the challenged action will cause a specific and personal harm." Kucera v. State, Dept. of Transp., 995 P.2d 63. "Doctrine of standing prohibits the litigant from raising another's legal rights." Haberman v. Washington Public Power Supply System, 744 P.2d 1032.*

Moreover, the 17th Circuit Court Administrative Tribunal lacked jurisdiction to prosecute this matter. In this situation, the court lacked both subject-matter jurisdiction and personal jurisdiction. The defendants failed to demonstrate that they had a valid claim within the court's jurisdiction (subject-matter), and they also did not establish that they had the authority to bring the case against I, Solon-keith (personal jurisdiction). As a result, the court's decision in this matter does not have legally bound I, Solon-keith. The principle that a judgment from a court lacking personal jurisdiction violates due process has long been established in legal jurisprudence. In the landmark case of *Pennoyer v. Neff*, the U.S. Supreme Court declared that a judgment from a court without personal jurisdiction is in violation of the Due Process Clause. This principle was reaffirmed in *Burnham v. Superior Court of California, County of Marin*, where the Supreme Court emphasized the importance of personal jurisdiction in upholding due process rights. Under the Fourteenth Amendment, all individuals are entitled to equal protection of the law. By allowing judgments to be issued in cases where the court lacked subject matter jurisdiction, I, Solon-keith had an unfairly disadvantaged, while DEFENDANTS' benefited. This unequal treatment is a violation of the principle of equal protection.

- g) **Void Judgments:** It is a well-established legal principle that judgments issued by a court lacking jurisdiction are void. This principle has a historical basis tracing back to English law and was firmly established by Lord Coke in the Case of the Marshalsea in 1612. Therefore, any judgments issued without the necessary subject matter jurisdiction must be declared void and nullified. The proposition that the judgment of a court lacking jurisdiction is void traces back to the English Year Books, see *Bowser v Collins*, Y. B. Mich. 22 Edw. IV, f. 30, pl. 11, 145 Eng. Rep. 97 (Ex. Ch. 1482), and was made settled law by Lord Coke in Case of the Marshalsea, 10 Coke Rep. 68b, 77a, 77 Eng. Rep. 1027, 1041 (K. B. 1612).

- *Jurisdiction is the power to hear and determine the subject matter in controversy between parties to a suit to adjudicate or exercise any judicial power over them". Rhode Island v. Massachusetts, 37 U.S. 657 (1838).*
- *Jurisdiction has been defined as the power to hear and to determine a legal controversy; to inquire into the facts, apply the law, and to render and enforce a judgment; the right to adjudicate concerning the subject matter in a given case.*
- *"When a court has no authority to act, its acts are void, and may be treated as nullities anywhere, at any time, and for any purpose". High v. Pearce, 220 N.C. 266, 17 S.E. 2d 108 (1941).*

- *The question of whether the court has subject matter jurisdiction frequently arises when counsel has to decide whether to bring a support or custody proceeding in the Supreme Court or the Family Court. A judgment or order made without subject matter jurisdiction is void. The defect may be raised at any time and may not be waived. Lacks v Lacks, 41 N.Y.2d 71, 390 N.Y.S.2d 875 (1976). Bringing an action in a court that lacks subject matter jurisdiction will result in dismissal.*
- *The Family Court does not have equity jurisdiction. Eden M. v. Ines R., 97 Misc. 2d 256, 410 N.Y.S.2d 997 (Fam. Ct. 1978). It does not have jurisdiction over matters concerning personal property. Matter of Ruth H., 159 A.D.3d 1487, 72 N.Y.S.3d 694 (4th Dep't 2018).*
- *Family Court Act § 439 (a) limits the subject matter jurisdiction of Support Magistrates. Support Magistrates are not empowered to hear, determine and grant any relief with respect to issues specified in Family Court Act §455, issues of contested paternity involving claims of equitable estoppel, custody, visitation including visitation as a defense, and orders of protection or exclusive possession of the home, which must be referred to a judge. The subject matter jurisdiction of Support Magistrates is to be strictly construed. Matter of Rubino v Morgan, 203 A.D.2d 698, 609 N.Y.S.2d 977 (3 Dept., 1994).*
- *The family Court is of limited power and therefore, it is necessary that jurisdiction in any particular case must affirmatively appear on the record. IN MATTER OF GARDNER V. DOM. REL. CT. OF CITY OF N.Y., 184 MISC. 44.*

5. Conspiracy against the rights and Excessive Enforcement Powers:

The DEFENDANTS initiated legal proceedings under the term "ex relatione," which essentially means that while the charges are brought by the prosecutor, one of the individuals involved in the case has a personal stake in the outcome. However, despite the use of "ex relatione," the DEFENDANTS still lacked personal jurisdiction over the matter. In this case, the DEFENDANTS failed to establish personal jurisdiction because they did not have a valid claim or injury that would justify their involvement in the legal proceedings. While "ex relatione" implies a personal stake, it does not automatically confer personal jurisdiction if the underlying claim lacks merit or legal validity.

Furthermore, the use of "ex relatione" in this context BRINGS FORTH conspiracy against the rights of, I, Solon-keith. By the DEFENDANTS actions including the prosecutor and other parties involved, conspired to bring forth legal proceedings without a valid basis, subject matter or personal jurisdiction. Conspiracy against the rights of I, Solon-keith represent a serious violation of both due process and equal protection under the law. Initiating legal proceedings without subject and personal jurisdiction and based on conspiratorial collaboration infringes upon my protected constitutional rights, interest, immunities and liberties.

6. **Excessive Enforcement Powers:** DEFENDANTS, (excluding Stephany Byrom and Tamera Morgan) in this case wielded enforcement powers that were not properly constrained or subjected to judicial review. DEFENDANTS were granted broad enforcement powers, which included actions such as suspending licenses, arrests, imprisonment, and garnishing wages, all without adequate due process protections. One of the most significant violations of due process occurred when the STATE OF MICHIGAN, acting through its officers, officials, and agents from the MICHIGAN DMV DEPARTMENT OF MOTOR VEHICLES, deprived I, Solon-keith of procedural due

process by the suspension of license without providing an opportunity to be heard or present objections. I, Solon-Keith driver's license is a property interest protected and secured by the Fourteenth Amendment of the United States Constitution. Once issued, it may not be taken away without affording I, Solon-Keith procedural due process, which includes notice and an opportunity to be heard. However, the administrative legal procedures in place did not provide for any meaningful procedural hearing, nor did they offer a hearing at a meaningful time, as required by the principles of due process. This lack of procedural safeguards violated I, Solon-Keith constitutional right to a fair due process before having driver's license suspended. As a result of these constitutional violations, I, Solon-Keith suffered irreparable harm. The license suspensions made it impossible for I, Solon-Keith to carry out necessary tasks, such as attending medical appointments, establishing and maintaining steady employment, and even visiting my children. All of these hardships were imposed due to an indebtedness in the form of fines or fees. This situation closely mirrors the case of *Damian Stinnie v. Richard Holcomb*, No. 21-1756 (4th Cir. 2022), where the court recognized the significance of providing due process protections before depriving individuals of property interests like driver's licenses.

7. **Holding Contempt Proceedings:** The DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*) initiated contempt proceedings against the Solon-Keith for non-payment of child support. This recurring practice and pattern of initiating contempt proceedings for non-payment of administrative child support represents a significant encroachment into the domain of the judicial branch, specifically in handling alleged contempt matters. Contempt proceedings, which involve determining whether a person has violated a court order, are typically within the purview of the judiciary.

However, in this case, the DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*) from various government agencies took it upon themselves to initiate and oversee these proceedings. By doing so, these agents and officers assumed a role that belongs exclusively to the judiciary. This is a clear violation of the separation of powers principle, as it involves the executive branch intruding into the judicial branch's domain. The judiciary is responsible for enforcing court orders and handling contempt matters, ensuring that proper procedures and due process are followed. Furthermore, the actions of all State of Michigan of the United States officers, officials, and agents involved in initiating and overseeing these contempt proceedings amount to a breach of their oath. Public officials, including those from law enforcement and government agencies, take an oath to uphold and defend the Constitution of the United States for America and the laws of the United States. This oath includes respecting the separation of powers and ensuring that each branch of government operates within its designated boundaries. In this case, these officials breached their oath by assuming a role that was clearly within the jurisdiction of the judiciary. Their actions not only infringed upon I, Solon-Keith due process rights but also undermined the fundamental principle of separation of powers that is vital to the functioning of this Republic for the government.

SECOND CLAIM FOR RELIEF:**TAMERA MORGAN ENGAGING IN CONSPIRACY and FRAUD. PRIVACY VIOLATION AND INFRINGEMENT ON PROPERTY RIGHTS**

The actions of Tamera-bettie: Morgan in this case represent a significant violation of privacy, conspiracy engagement and infringement on property rights. Without I, Solon-keith's agreement or consent, Tamera-bettie: Morgan unilaterally took it upon herself to involve the STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY, using the I, Solon-keith's name without my authorization—a clear infringement on my property rights and personal interests. What makes matters more concerning is that Tamera-bettie: Morgan, lacking any supporting evidence, knowingly and intentionally signed I, Solon-keith's name as the child's father to secure government assistance and child support. I, Solon-keith had repeatedly communicated my belief that I was not the child's father and urged Tamera-bettie: Morgan to handle the matter privately, without government intrusion. I even requested a paternity test, offering to share the test fees equally. Regrettably, Tamera-bettie: Morgan never responded to this request or took the test. Adding to the complexity, I, Solon-keith expressed my suspicion that Tamera-bettie: Morgan may have been engaged in sexual relations with other men during the conception period. Tamera-bettie: Morgan never explicitly denied the possibility of another man being the child's father and provided no concrete evidence to refute it. Despite these uncertainties, Tamera-bettie: Morgan illicitly forced the I,, Solon-keith into the role of the father, offering a mere hypothesis as evidence. The STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY disturbingly, accepted this information without I, Solon-keith's knowledge, consent, or authority. They treated Tamera-bettie: Morgan statements as factual without granting I, Solon-keith due process. Consequently, they designated I, Solon-keith as the child's father and compelled me to make child support payments. It is crucial to emphasize that I, Solon-keith never signed any contract or agreement voluntarily consenting to be recognized as the child's father or assuming the role of an obligor for child support payments. Tamera-bettie:Morgan's decision to enroll in government assistance and falsely identify I, Solon-keith as the father of her daughter, absent any proof of biological parenthood, amounts to fraud and conspiracy against rights. This entire ordeal constitutes a grave violation of privacy, an infringement on property rights, and an affront to due process.

- a) Tamera-bettie: Morgan fraudulently and falsely represented I, Solon-keith as the child's biological parent to secure government assistance and child support without evidence.
- b) Tamera-bettie: Morgan provided false statements under oath or submitted fraudulent documents to support her claims about I, Solon-keith's paternity, a violation of perjury.
- c) Tamera-bettie:Morgan used I, Solon-keith's personal information, including my name, without my authorization to initiate legal actions, this is identity theft.
- d) Tamera-bettie:Morgan intentionally misrepresented I, Solon-keith's paternity to receive child support payments to which she was not entitled.

Constitutional Violations and Rights Violated:

1. **Fourth Amendment Violation:** I, Solon-keith's Fourth Amendment right to be free from unreasonable searches and seizures was violated when the STATE OF MICHIGAN, FRIEND OF

THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY accepted private information about me without my consent or knowledge.

2. **Fifth Amendment Violation:** I, Solon-keith's Fifth Amendment right to due process was violated as I was deprived of a fair process and was assigned parental responsibilities without proper evidence or a chance to defend my rights.
3. **Fifth Amendment Violation (Continued):** I, Solon-keith's Fifth Amendment right against self-incrimination was potentially violated as I was coerced into a parental role without my consent or biological proof.
4. **Ninth Amendment Violation:** Tamera-bettie: Morgan's actions violated I, Solon-keith's Ninth Amendment rights, which protect rights not specifically enumerated in the Constitution, including the right to personal autonomy and decisions related to family and parenthood.
5. **Fourteenth Amendment Violation:** I, Solon-keith's Fourteenth Amendment right to equal protection under the law was violated as I was treated unfairly and assigned parental responsibilities without proper evidence or due process.
6. **Conspiracy Against Rights:** The actions of Tamera-bettie: Morgan and the STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY is conspiracy against I, Solon-keith rights, particularly my rights to privacy, property, due process, and equal protection under the law.

The actions of Tamera-bettie: Morgan and the agent acting on behalf of the State of Michigan, the Friend of the Court, Kent County Friend, Office of the Friend of the Court, and Title IV-D Agency are deeply troubling. Their actions were purposeful and intentional, as they actively conspired together to obstruct I, Solon-keith's pursuit of a paternity test. This obstruction is primarily aimed at extorting money from I, Solon-keith, while simultaneously allowing Tamera-bettie: Morgan to protect her interest in government assistance. One of the critical constitutional violations at play here is the denial of I, Solon-keith's request for a paternity test without presenting factual evidence that I am the genetic father of her daughter. This denial represents a clear and egregious invasion of the Due Process Clause of both the Fifth and Fourteenth Amendments to the United States Constitution for America. Denying I, Solon-keith the opportunity to establish paternity through a legitimate and fair process while still demanding child support payments amounts to a coercive and unconstitutional practice. This recurring practice and pattern is extortion and Extortion, in this context, involves compelling I Solon-keith to make financial payments under the threat of legal consequences without affording me the essential protections and procedural safeguards guaranteed by the Constitution. Such practices not only infringe upon the I Solon-keith rights but also undermine the integrity of the equitable system by perpetuating injustices and procedural improprieties. It is essential to recognize I have constitutional protected and secured rights, interests, liberties and immunities that must be respected and upheld, particularly when parental rights and financial obligations are at stake.

Moreover, the actions of Tamera-bettie: Morgan and the agent acting for the State of Michigan, the Friend of the Court, Kent County Friend, Office of the Friend of the Court, and Title IV-D Agency amounts to conspiracy to obstruct I, Solon-keith access to judicial remedies and processes without justification. This conspiracy violates I, Solon-keith right to access to justice, which is fundamental to the functioning of a fair and equitable lawful system.

State of Michigan, Friend of the Court, Kent County Friend, Office of the Friend of the Court, and Title

IV-D Agency agents, as government officials, are expected to act within the bounds of the law and the Constitution. Conspiring to deny I, Solon-keith a paternity test without valid evidence constitutes an abuse of state authority. It not only violates the principles of limited government power but also infringes upon the protection of I, Solon-keith rights, interests, liberties, and immunities.

THIRD CLAIM FOR RELIEF: ON-GOING CONSPIRACY ACTING UNDER COLOR OF LAW, COLOR OF OFFICE, COLOR OF AUTHORITY DEPRIVATION OF RIGHTS UNDER COLOR OF LAW. PATTERNS and PRACTICE.

The DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) have engaged in such actions willfully and knowingly, all while cloaking themselves with the semblance of state authority to commit fraud by and through the establishment and enforcement of fraudulent child support orders that were created with complete disregard of evidence of a contract and concrete facts. Title IV-D is a law that has given officers of the court the incentive to abuse their power under color of law to cause irreversible harm. These recurring practice and patterns collectively are patterns of behavior that implicates various constitutional and legal principles, including due process, equal protection, and the proper administration of justice...

1. **Creation of a Fictitious Inflated Income Accounting Contract:** The DEFENDANTS orchestrated a scheme to fabricate an inflated income accounting contract. This scheme appears to have been designed to compel I, Solon-keith to conform to the contract terms, ultimately resulting in increased revenues available to the court through Title IV-D funding. Such actions implicate issues related to fraud, coercion, and abuse of authority.
2. **Consideration of Facts Outside the Record:** The DEFENDANTS (excluding Stephany byrom and Tamera Morgan) have considered facts that were not presented in the prescribed manner of affidavit and under the penalties of perjury by DEENDANTS. This deviation from proper legal procedures did infringe upon I Solon-keith right to a fair and impartial legal process.
3. **Statements of Counsel in Briefs and Arguments:** The DEFENDANTS' (excluding Stephany Byrom and Tamer Morgan) actions relied on statements made by counsel in their legal briefs or arguments that did not suffice as grounds for granting motions to dismiss or summary judgment. The legal proceedings were not conducted in a judicially sound manner.
4. **Dismissal of Paternity Petition without Proof:** The dismissal of the paternity petition without requiring proof of I, Solon-keith biological fatherhood is coercion of I, Solon-keith into paying child support without due process. It violates I, Solon-keith rights to establish paternity and avoid unwarranted financial obligations unlawful arrests and imprisonment.
5. **Lack of Evidence of Unfit Parenting or Contract. DEFAMATION OF CHARACTER:** The absence of evidence in the record supporting claims of I, Solon-keith being an unfit parent or a contractual obligation to compel performance for any actions taken against I, Solon-keith is fraud. DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) did supply false information to credit reporting agencies (TRANSUNION, EQUIFAX, and EXPERIAN) regarding alleged arrears.

6. **Use of Instruments to Circumvent Fourth Amendment:** The use of instruments such as body attachments, bench warrants, and arrests as debt-collection tools to collect child support violates the Fourth Amendment's protections against unreasonable searches and seizures.
7. **CHILD SUPPORT/DOMESTIC RELATION HEARINGS are NOT JUDICIAL Proceedings, and** are before persons not judicial officers. "Traditionally that proposition was embodied in the phrase *coram non iudice*, "before a person not a judge" – meaning, in effect, that the proceeding in question was not judicial proceeding because lawful judicial authority was not present, and could therefore not yield a judgment. American courts invalidated, or denied recognition to, judgments that violated this common-law principle long before the Fourth Amendment was adopted. See, e. g., *Gruman v. Raymond*, 1 Conn. 40 (1814); *Picquet v. Swan*, 19 F. Cas. 609 (No. 11, 134) (CC Mass. 1828); *Dunn v. Dunn*, 4 Page 425 (N. Y. Ch. 1834); *Evans v. Instine*, 7 Ohio 273 (1835); *Steel v Smith*, 7 Watts & Serge. 447 (Pa. 1844); *Boswell's Lessee v. Ottis*, 9 How, 336, 350 (1850).

PENNOYER RULE [*Pennoyer rule-A rule that prevents courts from issuing personal judgements against defendants over whom they have no personal jurisdiction*. The name comes from a landmark case of the U.S. Supreme Court: *Pennoyer v. Neff*, 95 U.S. 714 (1878). Furthermore, under the Pennoyer rule it is prohibited for a court without personal jurisdiction is a violation of the 14th Amendment due process of law cause. It is a conclusion of law that a NON-JUDICIAL PERSON CORAM NON—JUDICE, a term the SUPREME COURT OF THE UNITED STATES prescribed cannot issue a judgement. A judgement by a person not a JUDGE CORAM NON-JUDICE is a VOID JUDGEMENT as a violation of the 14th Amendment of the Constitution for the United States of America. Any judgements made in violation of the 14th Amendment is void for failure to follow DUE PROCESS CLAUSE. See, e.g., 1 F. Hilliard, *The Law of Torts or Private Wrongs* §2, pp. 413–414 (1866) (Hilliard) ("The general principle is laid down, that an action lies for maliciously causing one to be indicted, whereby he is damnified, either in person he has no good reason to believe are justified by the facts and the law" (emphasis added)); M. Newell, *Law of Malicious Prosecution, False Imprisonment, and Abuse of Process* §1, p. 3 (1892) (Newell) (same); see also W. Prosser, *Law of Torts* 860 (1941) ("The interest in freedom from unjustifiable litigation is protected by an action for malicious.

8. **Impartial adjudicator. Impartial hearing:** A NON-JUDICIAL PERSON presiding over a TITLE IV-D SUPPORT matter is an administrator and clearly not an impartial adjudicator because the salary of the NON-JUDICIAL PERSON is derived from TITLE IV-D FEDERAL INCENTIVE FUNDS arising from the Judgments issued by the aforementioned NON-JUDICIAL ADMINISTRATOR. "But it certainly violates the Fourteenth Amendment, and deprives a defendant in a criminal case of due process of law, to subject his liberty or property to the judgment of a court the judge of which has a direct, personal, substantial, pecuniary interest in reaching a conclusion against him in case", *TUMNEY v. OHIO* 272 U.S. 510 (1927) SUPREME COURT OF UNITED STATES. Therefore, the NON-JUDICIAL PERSON cannot be an IMPARTIAL ADJUDICATOR as guaranteed by the FOURTEENTH AMENDMENT OF THE CONSTITUTION FOR THE UNITED STATES OF AMERICA based on the grounds the NON-JUDICIAL PERSON benefits From each SUPPORT ORDER is rendered and/or issued, and it is a violation of DUE PROCESS and forced Solon-keith to TENDER A SUM or as the ORDER

STATES PAY A SUM OF MONEY through a TITLE IV-D COLLECTION AGENCY and FEDERAL FUNDS paid for every dollar collected is deposited into STATE or LOCAL TREASURY where the salary of the NON-JUDICIAL PERSON is paid deprived from these acts are not even close to maintain the appearance of impartiality.

These calculated actions were purposefully undertaken with the intent to deliberately subject I, Solon-keith to the deprivation of rights under the guise of the law, thereby invoking the concept of acting under color of law. "Where a state law impinges upon a fundamental right secured by the U.S. Constitution it is presumptively unconstitutional. *Harris v. Mcrae*, 448 U.S. 297 (1980); *Zablocki v. Redhail*, 434 U.S. 374 (1978). Conclusion: where a statutory classification significantly interferes with the exercise of a fundamental right, constitutional scrutiny of state procedures is required

FOURTH CLAIM FOR RELIEF:

**UNREASONABLE UNLAWFUL SEARCH
AND UNREASONABLE UNLAWFUL
SEIZURE, FALSE/UNLAWFUL ARREST,
FALSE UNLAWFUL IMPRISONMENT,
INVOLUNTARY SERVITUDE. BILL OF
ATTAINER**

The DEFENDANTS (*excluding Stephany Byrom and Tamera Morgan*), intentionally and willfully did violate I, Solon-keith's rights and interests under the Fourth and Fourteenth Amendments to the United States Constitution of America, as well as provisions related to Bill of Attainder violations, by...

1. Conducting unreasonable and unlawful searches and seizures, thereby infringing upon the Solon-keith Fourth Amendment protected and secured right to be free from such intrusions, and
2. Carrying out unlawful false arrests, and perpetrating unlawful false imprisonment, which can be characterized as actions akin to kidnapping, human trafficking, and the unlawful restraint of the physical body for ransom, constituting an egregious violation of the PLAINTIFF's Fourth and Fourteenth Amendment rights, as well as invoking the principles against Bill of Attainder violations, which prohibit the imposition of punishment without due process of law.
 - "The essential elements of due process are notice and an opportunity to defend". *Simon v. Craft*, 182 US 427. Issuing a warrant and taking a man to jail without establishing personal jurisdiction by due process procedure is not only a constitutional law violation, civil tort, but is equal to him being punished being deprived of his liberty before having his day in court. Due process is a mandatory and necessary element of every action, criminal and civil, that has been established to protect and maintain the individual rights of the alleged defendant against the arbitrary deprivation of his life, liberty, and/or property. Denial of due process and equal protections of the law is a jurisdictional defect of constitutional magnitude and the court lacks jurisdiction.
3. **UNLAWFUL SEARCH:** The prosecution of I, Solon-keith for failure to pay child support constitutes a "search" within the purview of the Fourth Amendment, as it entails the government's "intrusive and unjustified" interference with I, Solon-keith's liberty interest. This legal action, undertaken by the DEFENDANTS seeks to scrutinize and penalize I, Solon-keith based on allegations of non-payment of child support, thus involving a significant intrusion into his personal life and financial affairs. Such governmental actions trigger Fourth Amendment protections, which guard against unreasonable searches and seizures. By subjecting I, Solon-keith

to legal proceedings for alleged child support non-payment, the government enters a domain that requires careful examination to ensure that constitutional rights, particularly those related to personal liberty and privacy, are not unduly violated or compromised.

4. **INVOLUNTARY SERVITUDE:** Inducing I, Solon-keith into involuntary servitude for alleged CHILD SUPPORT indebtedness: The DEFENDANTS' actions have further exacerbated the situation by effectively inducing I, Solon-keith into a state of involuntary servitude due to alleged CHILD SUPPORT indebtedness. By relentlessly pursuing and enforcing child support obligations without proper evidence or due process, the DEFENDANTS have coerced I, Solon-keith into performing labor against his will. This practice amounts to a severe violation of my rights, as it compels me to work under duress to meet financial obligations, thus infringing upon my free will and subjecting me to a form of involuntary servitude.
5. **ISSUANCE of UNLAWFUL WARRANTS. Unlawful Authorization of Arrest in Child Support Proceedings Violation of Fourth Amendment Rights:** "A support order is not a warrant guaranteed by the 4th Amendment. A support order is a summary judgment that is routinely sent to the third party State, City, or County Child Support Enforcement Debt Collection Agency". The 4th Amendment of the Bill of Rights requires that a warrant be issued under sworn oath before a search and therefore, it is required that non-judicial court employees provide proof of oath of office before performing a ministerial act of issuing a money judgment.

DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) DID issue Summons authorizing the arrest of I, Solon-keith for alleged non-payment of child support. This action amounts to an explicit authorization for an arrest, violating the Fourth Amendment to the United States Constitution for America. The Fourth Amendment safeguards individuals from unreasonable searches and seizures. In this context, the authorization of an arrest based on alleged non-payment of child support is a form of seizure.

6. **Unlawful Seizure and Theft of Private Property through Income Withholding:** The DEFENDANTS, in clear violation of my rights, knowingly and willfully engaged in actions that resulted in the unlawful seizure and theft of my private property. Their actions extended to issuing orders and judgments with the deliberate intent of seizing not only my physical BODY, my employment earnings and my driver's license, all under the pretext of satisfying CHILD SUPPORT indebtedness. These actions, though carried out under the guise of legal authority, represent a significant infringement upon my fundamental rights. By compelling income withholding, the DEFENDANTS effectively expropriated a portion of my private property without proper due process or legal justification.
 - NO FREE man or woman can be IMPRISONED, DISPOSED OF PROPERTY, OUTLAWED, EXILED OR RESTRAINT OF LIBERTY AND DISPOSED OR PROPERTY by UNLAWFUL ORDERS AND JUDGMENTS. "*Executive imprisonment has been considered oppressive and lawless since John at Runnymede pledged that no freeman should be imprisoned, dispossessed, outlawed or exiled by judgment of his peers or by the law of the land. The judges of England developed the WRIT OF HABEAUS CORPUS largely to preserve these immunities from executive restraint.*" See **Shaughnessy v. United States ex rel. Mezei, 345 U.S. 206, 218-219 (1953)**. The SUPREME COURT has held that RESTRAINT OF LIBERTIES OR DIPOSESSION OF PROPERTY by EXECUTIVE AUTHORITIES IS UNCONSTITUTIONAL. An example of this restraint of liberty and dispossession can be found by a SUPPORT ORDER achieved by ADMINISTRATIVR

PROCEDURES by EXECUTIVE AGENCY and not by Judicial Court or Judicial Officers/Judges. The glossary of terms defines how SUPPORT ORDERS are procured and supports the claim they are UNCONSTITUTIONAL. *"Administrative Procedure a method by which support orders are made and enforced by an executive agency rather than by courts and judges"*, see www.acf.hhs.gov/sites/default/files/programs/css/child_support_glossary.pdf.

- **The Eighth Amendment to the United States Constitution** prohibits cruel and unusual punishment. Imprisoning Solon-Keith for a debt/non-payment of child support violates Solon-Keith's rights and interest.
- **The 13th Amendment to the United States Constitution** prohibits involuntary servitude. Debtors' prison is a form of involuntary servitude, and it is therefore prohibited by the 14th Amendment to the Constitution to the United States of America.
- **The Equal Protection Clause of the Fourteenth Amendment** requires that the state treat people equally under the law. This means that the STATE OF MICHIGAN or its agencies cannot arrest a man for a debt/non-payment of child support.
- **Dunaway v. New York (1979)** - The Supreme Court held that the arrest of a suspect is illegal if the arresting officer did not have probable cause to believe that the suspect had committed a crime. Arresting a man for a debt/ non-payment of child support, is unreasonable and violate the Fourth Amendment.

7. Unlawful Warrants and Unconstitutional Pattern and Practice Policies: Violation of Privacy, Physical Trespass, and Extortion of Constitutional Right: The issuance of unlawful warrants and the implementation of unconstitutional pattern and practice policies have led to violations of fundamental constitutional rights, including the right to privacy and protection against physical trespass onto my body. Defendants DID Deprive me of my character by falsely alleging through arrest, photos, and fingerprints that I do not aid, nurture, or care for my genetic children. These violations have had severe consequences, as I have been arrested, lodged, extorted, and made to pay for my freedom on multiple occasions. These actions carry significant legal significance as they strike at the core of individual liberties protected by the Constitution of the United States for America. The Fourth Amendment guarantees the right to be free from unreasonable searches and seizures, including fingerprinting and photographing, which, when conducted without proper legal authority, infringe upon an individual's privacy. Furthermore, the physical trespass onto my body raises concerns about bodily autonomy and integrity, which are also protected constitutional interests.

CHILD SUPPORT are civil debts, not enforceable by contempt procedures, since the Constitution did away with debtor's prison. DAVIS V. BROUGHTON, 382 SW 2d 219. CHILD SUPPORT is a civil matter and there is no probable cause to seek or issue body attachment, bench warrant, or arrest in child support matters because it is a civil matter. The use of such instruments (body attachment, bench warrants, arrests, etc) presumably is a method to "streamline" arresting people for child support and circumventing the Fourth Amendment to the United States Constitution, and is used as a debt-collecting tool using unlawful arrests and imprisonment to collect a debt or perceived debt.

- The arrest of non-custodial parents in which men make up significant majority of the "arrestees", is "gender profiling", "gender biased discrimination" and a "gender biased hate crime" in that it violates the Equal Protection Clause of the Fourteenth Amendment.
- A man, pursuant to the Equal Protection Clause -of the Constitution of the United States, cannot be arrested in a civil matter, as a woman is not. "Probable cause" to arrest requires a showing that both a

crime has been, or is being committed, and that the person sought to be arrested committed the offense, U.S. Constitution, Amendment the Fourth.

- Therefore, seeking of body attachment, bench warrant, or arrest by the DEFENDANTS, and/or issuing of the same by the court, in this civil case would be against the law and the Constitution. Under U.S. v. Rylander ignorance of the order or the inability to comply with the [child support] order, to pay, would be a complete defense to any contempt sanction, violation of a court order or violation of litigant's rights.
- If a person is arrested on less than probable cause, the United States Supreme Court has long recognized that the aggrieved party has a cause of action under 42 U.S.C. § 1983 for violation of Fourth Amendment rights. *Pierson v. Ray*, 386 U.S. 547, 87 S.Ct. 1213 (1967). *Barlow v. Fitzgerald* 457 U.S. 800, 818 (there can be no objective reasonableness where officials violate clearly established constitutional rights such as: U.S. Constitution, Fourth Amendment (including Warrants Clause), U.S. Constitution, Fifth Amendment (Due Process and Equal Protection U.S. Constitution, Fifth Amendment (Due Process and Equal Protection), 23Page U.S. Ninth Amendment (Rights to Privacy and Liberty), U.S. Fourteenth Amendment (Due Process and Equal Protection).
- The Supreme Court ruled in *Malley v. Briggs*, 475 U.S. 335, 344 (1986), that the mere fact that a judge or magistrate issues an arrest warrant does not automatically insulate the officer from liability for an unconstitutional arrest. "Only where the warrant application is so lacking in indicia of probable cause as to render official belief in its existence unreasonable ... will the shield of immunity be lost". *Malley* at 344- 45.
- As can be ascertained, a body attachment is a debt-collecting tool using unlawful arrests and unlawful imprisonment for debt to collect a debt. Hence, it is illegal and unconstitutional, hence, rendering the issuing authority of such an order in violation of the law and the Constitution, stripping him of his jurisdiction, and, therefore, his judicial immunity. Furthermore, it would also render the Plaintiff (and her attorney) liable to prosecution under federal (and state) statutes. Per federal law, see *Marbury v. Madison*, 5 U.S. 137 (1803), the state must provide remedy for each and every violation of a right.

FIFTH CLAIM FOR RELIEF:

VIOLATION OF PRIVACY AND FIRST AMENDMENT RIGHTS IN CHILD SUPPORT STATUTES: THE UNCONSTITUTIONAL INTRUSION INTO PARENTAL DECISION-MAKING

DEFENDANTS (excluding Stephany Byrom and Tamera Morgan) have engaged in such actions willfully and knowingly enforcing child support statutes that did infringe on I, Solon-Keith parental rights, privacy, and equal protection under the law.

1. **Privacy Interest and First Amendment Rights:** The STATE OF MICHIGAN income-based child support statutes impermissibly infringe upon the Privacy Interest right under the 14th Amendment of the Constitution of United States for America and the First Amendment rights, which include the right to make decisions inside the home, including child-rearing decisions. It argues that child support effectively removes a father's rights to independent self-determination protected by the U.S. Constitution for America.
2. **Parental Decision-Making:** Determining how much money a parent spends on the care and maintenance of their child is fundamentally a parenting decision and a constitutionally guaranteed, protected and secured right and interest. It contends that the DEFENDANTS not allowed to intrude upon this fundamental right without demonstrating demonstrable harm to the child.

3. **Corrective or Punitive Child Support:** Corrective or punitive child support can only be ordered if it can show profound positive disqualification or wrongdoing that "shocks the conscience" of the community. The doctrine of *parens patriae*, which allows state intervention in child-related matters, should only be invoked reluctantly and as a last resort to save the child.
4. **Infringement on Self-Determination:** The STATE OF MICHIGAN, with premeditation, has removed all Solon-keith rights self-determination in this matter, which is considered a fundamental right as a father.
5. **Inequality in Child Support:** The DEFENDANTS requires that I, Solon-keith to pay child support but does not impose a similar requirement on Stephany Byrom or Tamera Morgan to either spend that money on the children or pay an equivalent sum herself, leading to unequal treatment under the law.

Michigan department of health human service on page 13 states, *"If I apply for child support services, do I have any rights? Yes, you have the right to receive fair and nondiscriminatory treatment, and have all your private data treated confidentially."* DEFENDANTS, administrative practice and patterns violate I, Solon-keith constitutional protected and secured rights, interests, liberties and immunities of Equal protection. DEFENDANTS, did release my private information to credit bureaus (Transunion, Equifax and Experian) and made it public notice on ACCESS KENT online portal of alleged child support indebtedness upon the arrest of I, Solon-keith, yet according to the Michigan Department of Health Human Services processes protects the interest of Stephany Byrom and Tamera Morgan individually.

6. **CHILD SUPPORT RECOVERY ACT (CSRA) and Violation of Constitutional Rights:** The CSRA grants instrumentalities of the STATE OF MICHIGAN, the DEFENDANTS the authority to enforce child support obligations under the guise of official policy and law. This enforcement leads to the violation of constitutional protected and secured rights, immunities, liberties and interests by enabling state employees, agents, officers, and public servants to enact criminal and felony charges for child support debt.
7. **Tenth Amendment Violation:** CSRA's provisions and the authority it grants to the DEFENDANTS violate the Tenth Amendment of the U.S. Constitution. The Tenth Amendment emphasizes that powers not delegated to the United States by the Constitution for America, nor prohibited by it to the States.
8. **Congressional Overreach:** Congress exceeded its constitutional powers in enacting CSRA, as it infringes on matters that are traditionally within the authority of the states. It cites James Madison's statement to underline the reserved powers of the states in areas concerning the lives, liberties, properties of the people, and the internal order and prosperity of the state.
9. **Criminal Nature of CSRA:** The criminal nature of CSRA, which aims to punish parents delinquent in their child support payments. It underscores that defining and enforcing criminal law primarily fall under the authority of the states in the federal system. Therefore, CSRA's criminal provisions is an overreach of federal power that grants the illegality of bill of attainders.
10. **Conversion of Legal Status:** Child support statutes intentionally converted I, Solon-keith living man into the legal status of a "non-custodial parent," "paternal parent," "legal parent" "payer" and "obligor." This conversion was done to create fraudulent contracts or interstate commercial contracts, without the involvement of judicial proceedings or trial by jury.
11. **Simulating Legal Process:** The DEFENDANTS did engage in a systematic simulation of the legal process. They accomplished this by meticulously preparing, issuing, serving, and executing a variety of legal documents, including orders, warrants, summons, judgments, and other similar instruments. These documents were intentionally designed to direct I, Solon-keith to take specific

actions based on what is claimed to be a misleading and fraudulent representation of facts. This simulation of the legal process involves the deliberate creation of an appearance of legality and legitimacy while, in reality, lacking the necessary foundation of truth and fairness. Such actions not only undermine the integrity of the legal system that has severe consequences for the rights and interests of I, Solon-Keith. The due process rights, interests, liberties and immunities of I, Solon-Keith has been encroached upon by the abuse of legal authority by the DEFENDANTS. This manipulation of the legal process is a serious matter from the actions of the DEFENDANTS and their adherence to legal and ethical standards. *"A person commits the offense of simulating legal process if he sends, delivers, mails or in any manner shall cause to be sent, delivered, or mailed, any paper or document simulating or intended to simulate a summons, complaint, writ, or other court process of any kind, to any person, firm, company, or corporation, for the purpose and intent of forcing payment of any alleged claim, debt, or legal obligation" ... A person commits simulating legal process when he or she issues or delivers any document which he or she knows falsely purports to be or simulates any civil or criminal process. A person commits the offense of simulating legal process if, with purpose to mislead the recipient and cause him or her to take action in reliance thereon, he or she delivers or causes to be delivered".* Full Faith and Credit see Section 14-178, Norfolk and see American Legal Publishing.

- *No statutory scheme contains a constitutionally compliant evidentiary standard. "Clear and convincing" evidence (of parental unsuitability) is the highest evidentiary standard in civil law that meets constitutional scrutiny pursuant to Santosky v. Kramer, 455 U.S. 745 (1982). Statutes expressly written which diminish parents' fundamental rights, are not constitutionally compliant, and therefore do not meet strict scrutiny under federal law. Conclusion: Where both parents' rights are diminished under state law, there is no set of circumstances that a constitutional outcome can ever be achieved.*

If a law impinges on a fundamental right explicitly or implicitly secured by the Constitution for the United States for America it is unconstitutional invasion that is presumptively unconstitutional. If a law has no other purpose than to chill assertion of constitutional rights by penalizing those who choose to exercise them, it is patently unconstitutional.

- *The Fourteenth Amendment prohibits the state from depriving any person of "life, liberty, or property without due process of law." The Court has long recognized that the Due Process Clause "guarantees more than fair process." Washington v. Glucksberg, 521 U.S. 702, 719 (1997). It also includes a substantive component that "provides heightened protection against government interference with certain fundamental rights and liberty interests." id., at 720; see also Reno v. Flores, 507 U.S. 292, 301-302 (1993).*

SIXTH CLAIM OF RELIEF:

STEPHANY BYROM INTENTIONAL PARTICIPATION IN FRAUD AND CONSPIRACY AND TRESPASS AGAINST FATHER'S RIGHTS

Stephany-lee: Byrom deliberate and willful actions in constructive fraud, conspiracy and trespass against my person and property hold significant legal consequences. Stephany-lee: Byrom conduct encompasses multiple charges and legal violations, including:

1. **Identity Theft:** Stephany-lee: Byrom intentionally used and offered my personal information for the procurement of STATE OFFERED TITLE IV-D services/benefits, commonly known as Child Support, without my consent, authorization, or permission. This constitutes identity theft, which is a criminal offense under federal and state laws.
2. **False Claims Without Proof:** Stephany-lee: Byrom made unsubstantiated claims regarding my fitness as a father, my income, and financial situation without providing any concrete evidence. These baseless claims were presented as fact, influencing the DEFENDANTS' decisions and furthering her agenda to secure more support money.

3. **Financial Loss:** I, Solo-keith, as the Father, have suffered substantial financial loss as a result of Stephany-lee: Byrom actions, which further compound the severity of her offenses.
4. **Unauthorized Access to Social Security Information:** Stephany-lee: Byrom knowingly and willfully gained unauthorized access to my Social Security information and supplied it to various DEFENDANTS' without my authority or consent. This is a violation of privacy rights involve charges related to identity theft and fraud.
5. **Unauthorized Access to Credit Card Information:** Stephany-lee: Byrom unlawfully gained access to my credit card, taking a photocopy of it without permission. Supplying my credit card information to DEFENDANTS' without consent constitutes both identity theft and fraud.
6. **Stealing Credit Card as Evidence:** Stephany-lee: Byrom unlawfully gained access to my credit card and used it as evidence to support her claims and bolster her demands for increased child support. This action constitutes a clear violation of privacy, fraud, misrepresentation of facts, deceptive practices and trust.
7. **Unauthorized Information Utilization** Stephany-lee: Byrom knowingly and intentionally utilized unauthorized stolen information, such as my Social Security account details, to fabricate fraudulent domestic relation and child support financial obligation contracts. By taking this step without my knowledge, consent, or agreement, she engaged in a deceptive practice that constitutes constructive fraud.
8. **Fraudulent Representation:** Stephany-lee: Byrom supplying my Social Security information to state agencies under her own volition, without my agreement or awareness, IS fraudulent representation. These actions distorted the facts and manipulated legal documents to achieve Stephany-lee: Byrom objectives within the child support system.
9. **Perjury and Misrepresentation:** Stephany-lee: Byrom actions related to perjury and misrepresentation. By knowingly presenting my Social Security information as factual and accurate, she misled DEFENDANTS, leading to decisions that affected my rights and financial obligations. Any false representation under oath results in legal consequences.
10. **Invasion of Privacy:** The unauthorized access to my Social Security information and Credit card information represents a blatant invasion of my personal privacy. Our Social Security numbers are among the most sensitive and confidential pieces of information, and any access to them without consent is a clear breach of privacy rights.
11. **Manipulation of Legal Documents:** Stephany-lee: Byrom involvement in manipulating legal documents with stolen information suggests an orchestrated effort to create a false narrative that ultimately impacted my god-given obligations and rights as a father. This manipulation of documents includes the misrepresentation of my identity and financial circumstances, resulting in significant legal consequences for both myself and the DEFENDANTS.
12. **False Accusations and Claims:** Stephany-lee: Byrom intentionally and knowingly made false accusations and claims in a petition to modify child support, without producing any supporting evidence. This results in charges related to perjury and filing false reports.
13. **Conspiracy with the Friend of the Court:** Stephany-lee: Byrom intentionally conspired with the Friend of the Court, involving constructive and intrinsic fraud, in the following ways:
 - a. Utilizing unauthorized stolen information to create fraudulent domestic relation/child support financial obligation contracts without my consent.

Stephany-lee: Byrom collaboration with STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY) reflects a calculated and collaborative effort to perpetrate constructive fraud, a form of deceit that does involve direct false statements that manipulates circumstances and takes advantage of confidential information to achieve unlawful objectives. In this case, Stephany-lee: Byrom actions reveal a deliberate and intricate plan to conspire with the STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY) to her advantage, all while depriving me, Solon-keith of my rights, privacy, and due process.

14. **Subversion of Due Process:** By participating in this conspiracy, Stephany-lee: Byrom subverted the due process rights that I am entitled to when dealing with legal matters. Her actions demonstrate a disregard for the fundamental principles of fairness, transparency, and justice within the legal system.
15. **Adverse Effects on All Parties:** This conspiracy not only affected my rights but also had consequences for the child support agency itself. The agency was unwittingly drawn into a fraudulent scheme, resulting in an inaccurate representation of financial obligations and payments.
16. **Constitutional Violations:** Beyond the immediate legal implications, the use of her statements as facts in child support proceedings highlights constitutional violations. The reliance on unverified claims without evidence, under oath, may infringe upon the principles of due process and equal protection under the law.

SEVENTH CLAIM OR RELIEF:

INSUFFICIENT EVIDENCE. EXCLUSION OF EVIDENCE. IMPEACHMENT OF EVIDENCE. LACK OF CAUSE OF ACTION

The DEFENDANTS, deliberately and willfully neglected to establish any violations of a legal right, failed to plead any harm, and omitted presenting any substantiated claims against I, Solon-keith. DEFENDANTS' actions, or lack thereof, resulted in a failure to articulate the cause of actions on the official record.

- *"It is a fundamental principle of law that no person be adjudged guilty of a crime until the state has shown that a crime has been committed. The state therefore must show that a harm has been suffered of the type contemplated by the charges (for example, a death in the case of a murder charge or a loss of property in the case of a theft charge), and that such harm was incurred due to the criminal agency of another. Thus, it is sufficient if the elements of the underlying crime are proven rather than those of the particular degree or variation of that crime which may be charged."* State v. Allen, 335 So. 2d 823,825 (Fla. 1976).
- "Over the years our cases have established that the irreducible constitutional minimum of standing contains three elements. First, the plaintiff must have suffered an "injury in fact"-an invasion of a legally protected interest which is (a) concrete and particularized, see id., at 756; Warth v. Seldin, 42 U.S. 4990, 508 (1975); Sierra Club v. Morton, 405 U.S. 727, 740-741, n 16 (197); (1) and (b) "actual or imminent, not conjectural or hypothetical", Whitmore, supra, at 155 (quoting Los Angeles v. Lyons, 461 U.S. 995, 10 (1983). Second, there must be a causal connection between the injury and the conduct complained of the injury has to be "fairly...trace[able] to the challenged action of the defendant, and not...th[e] result [of] the independent action of some third party not before the court. See Simon v. Eastern Ky. Welfare Rights Organization, 46 U.S. 26, 41-42 (1976). Third, it must be likely as opposed to merely speculative, that the injury will be redressed by a favorable decision, Id., at 38, 43 Lujan Secretary of the interior v Defenders of Wildfire et al. 504 U.S. (1992).

DHS PUBLICATION 748 STATES... *"Work with the Prosecuting Attorney's office to start a case After you speak to a child support specialist, a Prosecuting Attorney in your county will contact you and ask you to provide information, complete a questionnaire, and schedule an interview in his/her office. You must attend this interview to assist the Prosecuting Attorney with the filing of your case and to remain cooperative with the child support program. If you are receiving public assistance benefits, failure to cooperate with the Prosecuting Attorney's office could result in the reduction or termination of your benefits. When you go to the Prosecuting Attorney's office, bring copies of documents, such as: • Driver's license or other valid photo identification. • Proof of residency if the address on the photo identification is not accurate. • Social Security card. • Marriage certificate and/or a Judgment*

of Divorce. • Birth certificate or a verification of birth for the child(ren). • Proof of income (pay stubs, tax returns, Social Security Income, etc.). • Child support orders from other states. • Photo of the non-custodial parent”.

According to this publication Stephany Byrom and Tamera Morgan individually initiate child support proceedings complaint against I, Solon-keithh without his knowledge and consent...In doing so the DEFENDANTS, intentionally and willfully, failed to fulfill the essential elements required for the verification of the existence of a crime. In their proceedings, they neglected to provide the necessary evidence to substantiate these elements of a complaint, an injury in fact and including:

1. **Verification of the Existence of a Crime:** The DEFENDANTS did not adequately demonstrate or verify the existence of a criminal offense. They failed to present clear and compelling evidence that would establish the commission of a crime and an injury in fact.

- a) **Corpus Delicti: The DEFENDANTS did not establish the corpus delicti of the alleged offense.** *Corpus delicti* refers to the body of the crime or the essential elements that prove a crime has occurred. In this case, the DEFENDANTS did not present sufficient proof to establish the essential elements of the alleged offense. The corpus delicti of a crime consists of two elements: (1) the fact of the injury or loss or harm, and (2) the existence of a criminal agency as its cause [citations omitted] there must be sufficient proof of both elements of the corpus delicti beyond a reasonable doubt. "American Jurisprudence Second Ed., Evidence § 1476 the "corpus delicti rule" which is not an element of the alleged crime, but a procedural rule. There is no corpus delicti pled in the complaint. Without a corpus delicti there is no crime: "Component parts of every crime are the occurrence of a specific kind of injury or loss, somebody's criminality as source of the loss, and the accused's identity as the doer of the crime; the first two elements are what constitutes the concept of "corpus delicti." U.S. v. Shunk, 881 F.2d 917, 919 C.A. 10 (Utah).

- a) "Occurrence of injury or loss, and its causation by criminal conduct, are termed the "corpus delicti." *People v. Assenato*, 586 N.E.2d 445, 448, 166 Ill.Dec. 487, 490. (Illinois).
- b) "While the corpus delicti must be proved beyond a reasonable doubt it may be established by circumstantial evidence..." *James v. State*, 248 A.2d 910, 912.
- c) "Criminal responsibility is imposed on the basis of the intentional doing of an act with awareness of the probability that the act will result in substantial damage, regardless of whether the injury turns out to be minor or insignificant." *Com. v. Ruddock*, 520 N.E.2d 501.
- d) "The term "corpus delicti" embraces occurrence of loss or injury and criminal causation thereof." *State v. Hill*, 221 A.2d 725, 728, 47 N.J. 490. "It has long been fundamental to the criminal jurisprudence of this Commonwealth that a necessary predicate to any conviction is proof of the corpus delicti, i.e., the occurrence of any injury or loss and someone's criminality as the source of this injury or loss. See *Commonwealth v. Burns*, 490 Pa. 619, 627, 187 A.2d 552, 556-557 (1963); *Commonwealth v. Turza*, 340 Pa. 128, 133, 16 A.2d 401, 404 (1940)." *Commonwealth v. Maybee*, 239 A.2d 332, 333. (Pennsylvania).

2. **Witness Testimony Admitting Dishonest Acts or False Statements:** The DEFENDANTS also failed to produce a credible witness who could admit to engaging in dishonest acts or making false statements relevant to the alleged crime. Witness testimony is often crucial in criminal proceedings to establish the guilt of the accused.

The DEFENDANTS' failure to meet these fundamental requirements about the validity and integrity of their legal actions. Without proper verification, evidence of the corpus delicti, or credible witness testimony DOES NOT substantiate the allegations and establish the guilt of the accused.

- 18 U.S. Code § 1001 - Statements or entries generally- (a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—
 - (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
 - (2) makes any materially false, fictitious, or fraudulent statement or representation; or
 - (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.
- *"A defect, whether of omission or commission, in process, pleading, parties, or procedure which deprives the court jurisdiction." Jurisdictional Defect, Ballentine's Law Dictionary 3rd Ed.*

EIGHTH CLAIM OR RELIEF:

**Breach of Due Process in Child Support Proceedings.
Unconstitutional Child Support Enforcement:
Violation of Due Process, Privacy, and Fourth/Fifth
Amendment Rights**

DEFENDANTS, by and thru it agents did intentionally, willfully, knowingly did breach DHS PUB:ICATION 748 UNDERSTANDING CHILD SUPPORT A HAND BOOK FOR PARENTS What must be done before I can get a child support order, identify both parents who are responsible for the child section states. *"Identify both parents who are responsible for the child Every child has both a biological mother and a biological father. The biological father is the man whose sperm joined the mother's egg to create the baby. The legal father may not be the biological father. The legal father is the man the law recognizes as the father of the child. When a married couple has a child, the law automatically recognizes the husband as the child's legal father. When an unmarried woman has a child, an official action is needed to establish the legal father of the child. This official action is called "paternity establishment." Paternity can be established in the following ways: If a child is born to an unmarried mother, she and the man claiming to be the father can sign an Affidavit of Parentage form to legally establish the father's legal rights. A court can determine the legal father of the child. Genetic testing may be done to determine the biological father of a child. A man claiming to be the father may want proof that he is the biological father of the child before he is named the legal father. In that case, he may request genetic testing. This testing may show that the man is not the biological father of the child, or it may show greater than 99 percent likelihood that the man is the father. Once legal parents have been identified, an order for child support can be established It is important to establish the legal father of a child Establishing paternity gives a child born outside of marriage the same legal rights as a child born to married parents. A child with a legal father is entitled to benefits through the father. These benefits include Social Security benefits, veterans' benefits, and inheritance rights. Children may also benefit by knowing their family's biological, cultural, and medical history. The child support program may assist either parent in establishing paternity for a child who does not have a legal father. **Paternity must be established before the court can order child support".***

Based on the **DHS PUB:ICATION 748 UNDERSTANDING CHILD SUPPORT A HAND BOOK FOR PARENTS What must be done before I can get a child support order, identify both parents who are responsible for the child section**, several constitutional violations and breaches of procedural

due process arise from DEFENDANTS' actions for violating the required procedural process to establish paternity before ordering child support. Violations are as follows:

1. **Fourth Amendment Violation (Unreasonable Searches and Seizures):** DEFENDANTS', did order child support without properly establishing paternity and without I, Solon-keith voluntarily signing an Affidavit of Parentage to legally recognize myself as the father of Tearra Tatum, Tyre Tatum, Jordan Tatum and Joslynn Morgan. This constitute an unreasonable seizure of I, Solon-keith financial resources without sufficient evidence of biological relationship to the children. This is unreasonable financial search and seizure, violating I, Solon-keith's Fourth Amendment protected and secured rights, interest, liberties and immunities.
2. **Fifth Amendment Violation (Self-Incrimination):** I, Solon-keith was compelled to financially support the above children without the proper establishment of paternity and without voluntarily signing an Affidavit of Parentage to legally acknowledge myself as the father. DEFENDANTS' did violate my protected and secured Fifth Amendment right, interest, immunities and liberties against self-incrimination. I, Solon-keith have been forced to financially incriminate myself without sufficient evidence of my biological connection to the children. The DEFENDANTS', coerced me into taking on financial responsibility without proper due process procedures, which infringe upon his Fifth Amendment rights.
3. **Due Process Violation: DEFENDANTS' did** Order child support without first properly establishing paternity is a violation of I, Solon-keith's right to due process and procedural due process. *Due process mandates a fair and lawful procedure before depriving someone of their property or financial resources.* Failing to establish paternity correctly before imposing child support constitutes a breach of due process and procedural due process. This violation resulted in I, Solon-keith being deprived of my financial resources without the necessary due process procedures and safeguards.
4. **BREACH OF CONTRACT:** The publication explicitly outlines the necessity of establishing paternity as a prerequisite before proceeding to order child support. Failure to adhere to this stipulation IS DEFENDANTS' breach of their "contractual" or procedural terms and conditions implied by the publication. Essentially, when the publication lays out the sequence of steps to be followed, it creates an implicit agreement or contract for the DEFENDANTS, including the enrollers Stephany Byrom and Tamer Morgan individually.

By not adhering to the publication's stated procedure and prematurely ordering child support without properly establishing paternity, the DEFENDANTS' violated the terms and conditions to their contract. This is a breach of the agreement's terms, which were put in place to protect the interests and rights of I, Solon-keith from being unlawfully identified as a child's biological father and/or legal father and forced into a financial obligation contract. Consequently, this breach is a failure to uphold the established procedures and contractual obligations outlined in the publication.

NINTH CLAIM FOR RELIEF:

BREACH OF FIDUCIARY DUTY

I, Soln-keith affirm that the DEFENDANTS mean OFFICIALS, OFFICERS and AGENTS acting on behalf of STATE OF MICHIGAN, FRIEND OF THE COURT, KENT COUNTY FRIEND, OFFICE OF THE FRIEND OF THE COURT, TITLE IV-D AGENCY, in conjunction with the MICHIGAN DMV DEPARTMENT OF MOTOR VEHICLES, and various Public Officers of the 17TH CIRCUIT COURT ADMINISTRATIVE TRIBUNAL THE STATE OF MICHIGAN STATE PROSECUTOR and KENT COUNTY SHERIFS by and thru its agents.

PUBLIC OFFICERS AND EMPLOYEES ARE PUBLIC TRUSTEES AS FIDUCIARIES OF THE PUBLIC TRUST

- **63C Am.Jur.2d, Public Officers and Employees, §247** “As expressed otherwise, the powers delegated to a public officer are held in trust for the people and are to be exercised on behalf of the government or of all citizens who may need the intervention of the officer.

5 CFR § 2635.101 - Basic obligation of public service. § 2635.101 Basic obligation of public service.

(a) Public service is a public trust. Each employee has a responsibility to the United States Government and its citizens to place loyalty to the Constitution,

(b) Laws and ethical principles above private gain. To ensure that every citizen can have complete confidence in the integrity of the Federal Government, each employee shall respect and adhere to the principles of ethical conduct set forth in this section, as well as the implementing standards contained in this part and in supplemental agency regulations.

(b) General principles. The following general principles apply to every employee and may form the basis for the standards contained in this part. Where a situation is not covered by the standards set forth in this part, employees shall apply the principles set forth in this section in determining whether their conduct is proper.

(1) Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.

- **Breach of Fiduciary Duty;** Breach of trust is a trustee's failure to act in accordance with the terms of the trust or the trustee's general fiduciary obligations. The trustee is subject to removal in the case of breach of trust and creates personal liability. Whether or not the violation was willful, fraudulent, negligent, or inadvertent, a trustee is said to have committed breach of trust if a duty imposed on him/her by equity was violated.

Furthermore, it has been stated that any enterprise undertaken by the public official who tends to weaken public confidence and undermine the sense of security for individual rights is against public policy. Fraud in its elementary common law sense of deceit-and this is one of the meanings that fraud bears [483 U.S. 372] in the statute.

- **See [United States v. Dial, 757 F.2d 163, 168 (7th Cir1985)]** the deliberate concealment of material information in a setting of fiduciary obligation. A public official is a fiduciary toward the public, including, the judge, in reference to litigants who appear before him and he deliberately concealed material information from them, he was guilty of fraud. [McNally v United States 483 U.S.350 (1987)].
- *"The law will protect an individual who, in the prosecution of a right does everything, which the law requires him to do, but fail to obtain his right by the misconduct or neglect of a public officer."* Lyle v Arkansas, 9 Howe, 314, 13 L. Ed. 153 .*"Where rights are secured by the Constitution are involved, there can be no rule-making or legislation which would abrogate them.* Miranda v. Arizona, 380 US 426 (1966).
- *"No man in this country is so high that he is above the law. No officer of the law may set that law at defiance with impunity. All the officers of the government, from the highest to the lowest, are creatures of the law and*

are bound to obey it.....it is the only supreme power in our system of government, and every man who, by accepting office participates in its functions, is only the more strongly bound to submit to that supremacy, and to observe the limitations it imposes on the exercise of the authority which it gives." U.S.v.Lee, 106 U.S. 196,2201 S. Ct. 240, 261, 27 L. Ed. 171 (1882).

CONCLUSION

A parent must provide care and maintenance for the child, but how they do so is tailored to their own beliefs, principles, and means. Parents love their children, as a rule, and how they provide for a child is subject to cultural, religious, and community standards. Colorable laws has allowed a third party to intrude into the intimacy of a parent-child relationship and transfer a parent's rights away even when the care and maintenance of the child. Justice Sandra Day O'Connor wrote, "*The Child Support Enforcement Act did not "create an individual entitlement to services this system wide requirement was not intended to benefit individual children and custodial parents". Title IV-D does not give rise to individual rights; it was not intended to benefit individual children and custodial parents, but is simply a yardstick for the Secretary to measure the system wide performance of a State's Title TV-D program Blessing, supra, 520 U.S. at 343, 117 S. Ct. at 1361, 17 L. Ed. 2d at 584*

I, Solon-keith, has been victimized for (25) plus years by a system of non-judicial misconduct by the DEFENDANTS', Public Trustees of the Public Trust that have perpetrated an unconscionable scheme to criminally defraud and willfully deprive people of their Constitutional protected and secures rights, interests liberties and immunities for the sole intent of unlawful financial gain. The DEFENDANTS' named in this case have conspired to commit fraud in the inducement, actual fraud, fraud in the factum, intrinsic and extrinsic fraud, civil fraud, constructive fraud, and concealment by and through the establishment and enforcement of fraudulent child support orders that were created with complete disregard of evidence and fact.

- *"Where a state law impinges upon a fundamental right secured by the U.S. Constitution it is presumptively unconstitutional. Harris v. Mcrae, 448 U.S. 297 (1980); Zablocki v. Redhail, 434 U.S. 374 (1978).Conclusion: where a statutory classification significantly interferes with the exercise of a fundamental right, constitutional scrutiny of state procedures is required.*
- *"Any denial of Due Process must be tested by the "totality of the facts" because a lack of Due Process may "constitute a denial of fundamental fairness, shocking to the universal sense of justice..." Malloy v. Hogan, 378 U.S. 1, 26 (1964).*
- ***U.S. v. Throckmorton, 98 US 61 WHEREAS, officials and even judges have no immunity See, Owen vs. City of Independence, 100 S Ct. 1398; Maine vs. Thiboutot, 100 S. Ct. 2502; and Hafer vs. Melo, 502 U.S. 21; officials and judges are deemed to know the law and sworn to uphold the law; officials and judges cannot claim to act in good faith in willful deprivation of law, they certainly cannot plead ignorance of the law, even the Citizen cannot plead ignorance of the law, the courts have ruled there is no such thing as ignorance of the law Cooper v. Aaron, 358 U.S. 1, 78 S.Ct. 1401 (1958). "No state legislator or executive or judicial officer can war against the Constitution without violating his undertaking to support it***

DEMAND FOR ARREST

The DEFENDANTS', agents/officials/Public Servants in this case have engaged in a criminal conspiracy to defraud the United States of America Republic Form of Government through the fraud and abuse thru color of law statutory laws of Title IV-D, Section 458 of the Social Security Act and other child support rules and guidelines. This fact has been made abundantly clear in the illegal activity and fraud that has been documented in SOLON TATUM cases. The administration of DEFENDANTS', by and thru its agents acting for DEFENDANTS has acted in violation of 18 U.S. Code § 1961 and has used threats and coercion to obtain funds from Solon-Keith in violation of a statutory code 18 U.S. Code § 1951. Title IV-D is a statutory law that has given officers of the court the incentive to abuse their power under color of law to cause irreversible harm to countless people and their families.

Pursuant to the Laws of the United States, I, Solon-Keith DEMAND the arrest of the above named felons. Pursuant to the statutes herein, in particular the Laws of the United States in general, We the People DEMAND that you pursue and prosecute ALL ET AL offenders that have violated their Oath of Office and the Laws of the United States.

DEMAND FOR SEIZURE OF EVIDENCE

Pursuant to the Laws of the United States, I Solon-Keith DEMAND the seizure and impound of ALL books, videos, records, Forensic Accounting for case numbers 410044221, 913429676, 912898503, 20170099830-DP, 1998-006147-DS, 2012-010237-DS, and fraudulent claims made by fictitious DEFENDANTS, including Stephany Byrom and Tamera Morgan on the account of ALL municipalities, Counties/Townships as evidence of the ongoing felony.

DEMAND FOR CLOSURE OF CASES AND/OR ACCOUNTS

I Solon-Keith, hereby demand the closure and dismissal of child support cases numbers 410044221, 913429676, 912898503, 20170099830-DP, 1998-006147-DS, 2012-010237-DS associated with SOLON TATUM, on the grounds of multiple constitutional violations. In light of these constitutional violations, I respectfully request the immediate closure and dismissal of all child support cases associated with me. These violations have resulted in a denial of my fundamental rights and protections guaranteed by the United States Constitution or America. I assert my right to seek redress and closure of these cases to rectify the infringements upon my constitutional rights.

I request the expeditious resolution of this matter to ensure the protection of my constitutional protected and secured rights and to rectify all harm caused by these violations. This demand for closure is made with the intent to safeguard my rights, interest, immunities and liberties, and uphold the principles of justice and fairness enshrined in the Constitution of the United States for America.

Should any person try to cover up the felony complained of herein, BE YOU HEREBY PUT ON NOTICE: You may be indicted under USC Title 18 sections 3, 4, 241, 242, 2381, 2382, 2383 and 2384.

Suitor, Natural man, being first truly sworn, states that he has knowledge of the felonies herein complained of: that it is not submitted to be vexatious, but to obtain imperative JUSTICE.

IN WITNESS WHEREOF I verify under divine retribution that the foregoing is true and correct, under my hand and seal. Executed per **Title 28 U.S.C. Section 1746(1)**.

Without Prejudice

By: Solon Keith Private Natural Man

All my rights, remedies and immunities are explicitly reserved and I exercise them

10/12/23

ACKNOWLEDGEMENT

State of Michigan)
) ss.
County of Kent)

SUBSCRIBED and AFFIRMED before Me. A Notary Public residing in KENT County, the State of Michigan. The above Sutor, Solon-keith Private appeared, known by me and identified himself, and affixed his signature hereto, the 12th day of October, 2023.

April Van Noord
Notary Public signature

March 13th 2029
My commission expires:



True Bill and Sum Certain

1. DENIED RIGHT OF LIBERTY AND INTEREST
\$250,000.00 5th Amendment
2. ENFORCED BILL OF ATTAINDER, PAINS & PENALTIES
\$250,000.00 U.S.A. Const. Article I Sec. 10
3. ENFORCED EX POST FACTO LAW, INVOLUNTARY SERVITUDE
\$250,000.00 U.S.A Constitution Article I Section 10
4. IMPAIRING THE OBLIGATION OF CONTRACTS
\$250,000.00 U.S.A Constitution Article I Section 10
5. UNLAWFUL SEARCH WITHOUT A WARRANT, UNREASONABLE SEIZURE, UNLAWFUL SEIZURE, UNLAWFUL ARREST
UNLAWFUL IMPRISONMENT, USE OF INSTRUMENTS, DUE PROESS VIOLATION
\$250,000.00 4th, 5th and 14th Amendment
6. EXCESSIVE FINE; CRUEL & UNUSUAL PUNISHMENT, EXCESSIVE ENFORCEMENT POWERS
\$250,000.00 8th Amendment
7. POWERS, RIGHTS, IMMUNITIES AND LIBERTIES RESERVED TO THE PEOPLE
\$250,000.00 10th Amendment
8. CONSPIRACY AGAINST RIGHTS, HOLDING CONTEMPT PROCEEDINGS, IMPARTIAL ADJUDICATIONS
\$310,000.00 U.S.A Constitution Article III
9. DEPRIVATION OF RIGHTS UNDER THE COLOR OF LAW, COLOR OF AUTHORITY, PATTERNS & PRACTICE, DUE
PROCESS VIOLATION
\$250,000.00 USC Title 42 Section 1983, 5th 9th & 14th Amendment
10. VIOLATION OF PROPERTY RIGHTS, THEFT OF PROPERTY, IDENTITY THEFT, TRESPASS TO PROPERTY, UNLAWFUL
USE OF SOCIAL SECURITY NUMBER, UNLAWFUL USE OF CREDIT CARD
\$250,000.00 USC Title 42 Section 1982
11. VIOLATION OF DUE PROCESS, LACK OF SUBJECT MATTER AND PERSONAL JURISDICTION
\$250,000.00 5th & 14th Amendment
12. FRAUDULENT STATEMENTS AND REPRESENTATION, DEFAMATION OF CHARACTER
\$500,000.00 (USC Title 18 Section 1001 violation U.S.A. Constitutional Article III
13. BREACH OF PUBLIC TRUST, VIOLATION OF OATH OF OFFICE, BREACH OF FIDUCIARY PROCESS
250,000.00 Article 6 Clause 3 Constitution of the United States
14. UNCONSCIONABLE CONTRACT
\$250,000.00 18USC 1341
15. FORCED IMPRESSIONS OF FINGERPRINTS, PHOTOS
\$250,000.00 5th Amendment
16. MALICIOUS PROSECUTION, VIOLATION OF IMPARTIAL ADJUDICATION, INSUFFICIENT EVIDENCE, EXCLUSION
OF EVIDENCE
\$250,000.00 5th Amendment
17. SEPARATION OF POWER VIOLATION, CHILD SUPPORT DEBT COLLECTION PRACTICES
\$250,000.00 Separation o Power Clause
18. TAMERA MORGAN, ENGAGING IN CONSPIRACY AND FRAUD, PRIVACY VIOLATION AND INFRINGEMENT ON
PROPERTY RIGHTS, FALSE ACCUSATIONS, MANIPULATION OF LEGAL DOCUMENTS, PERJURY AND
MISREPRESENTATION
\$100,000.00
19. STEPHANY BYROM, FRAUD, CONSPIRACY, TRESPASS AGAINST RIGHTS AND PROPERTY, MANIPULATION OF LEGAL
DOCUMENTS, FALSE ACCUSATIONS AND CLAIMS, INVASION OF PRIVACY, PERJURY AND MISREPRESENTATION
\$300,000.00
20. UNCONSTITUTIONAL STATUTES, UNCONSTITUTIONAL CHILD SUPPORT ENFORCEMENT, IMPEACHMENT OF
EVIDENCE, LACK OF CAUSE OF ACTION AND LACK OF THE NATURE AND CAUSE OF ACTION 4th, 5th & 10th
AMENDMENT
\$310,000.00

SUB-TOTAL	\$5,270,000.00
	FRAUD: X3
TOTAL:	\$ 15,810,000.00